

October 30, 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: LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M91740
AND M91741)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 103 to Facility Operating License No. NPF-39 and Amendment No. 67 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 January 27, 1995, as supplemented October 10, 1995.

These amendments eliminate the TS active safety function designation of eight (i.e., four per unit) Drywell Chilled Water System valves.

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. 103 to License No. NPF-39
Amendment No. 67 to License No. NPF-85
2. Safety Evaluation

cc w/encls:
See next page

DISTRIBUTION:

Docket File	MO'Brien	CGrimes
PUBLIC	FRinaldi	WLong
PDI-2 Reading	GHill(2)	ACRS(4)
SVarga	OGC	JZimmerman
JStolz	CAnderson, RGN-I	

subject + p noted change Done 10/23/95

OFC	:PDI-2/LA	:PDI-2/PM	:PDI-2/PM	:OGC	:PDI-2/D
NAME	:MO'Brien	:JZimmerman	:rb:FRinaldi	:Cmarco	:JStolz
DATE	: 10/16/95	: 10/16/95	: 10/16/95	: 10/16/95	: 10/27/95

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 30, 1995

Mr. George A. Hunger, Jr.
Director-Licensing, MC 62A-1
PECO Energy Company
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A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script 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. 103 to
License No. NPF-39
Amendment No. 67 to
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.103
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 January 27, 1995, as supplemented October 10, 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.

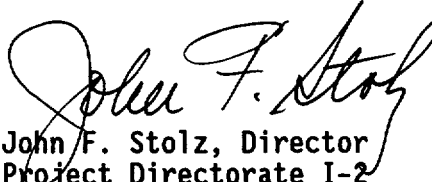
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 103, 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, to 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: October 30, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 103

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 6-24

3/4 6-25

3/4 6-43

Insert

3/4 6-24

3/4 6-25

3/4 6-43

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

PENETRATION NUMBER	FUNCTION	INBOARD ISOLATION BARRIER	OUTBOARD ISOLATION BARRIER	MAX. ISOL. TIME. IF APP. (SEC) (26)	ISOL. SIGNAL(S), IF APP. (20)	NOTES	P&ID
040G-1	ILRT DATA ACQUISITION	60-1057	60-1058	NA NA		11 11	60
040G-2	ILRT DATA ACQUISITION	60-1071	60-1070	NA NA		11 11	60
040H-1	CONTAINMENT INSTRUMENT GAS SUPPLY - HEADER 'A'	59-1005A(CK)	HV59-129A	NA 7	C,H,S		59
042	STANDBY LIQUID CONTROL	48-1F007(CK) (X-116)	HV48-1F006A	NA 60		29	48
043B	MAIN STEAM SAMPLE	HV41-1F084	HV41-1F085	10 10	B B		41
044	RWCU ALTERNATE RETURN	41-1017	41-1016(X-9A, X-9B) PSV41-112	NA NA NA		5,31	41
045A(B,C,D)	LPCI INJECTION 'A' (B,C,D)	HV51-1F041A(B,C, D)(CK) HV51-142A(B,C, D)	HV51-1F017A (B,C,D)	NA 7 38		9,22 9,22	51
050A-1	DRYWELL PRESSURE INSTRUMENTATION		HV42-147B	45		10	42
053	DRYWELL CHILLED WATER SUPPLY - LOOP 'A'	HV87-128	HV87-120A HV87-125A	60 60 NA	C,H C,H	11 11 34	87

LIMERICK - UNIT 1

3/4 6-24

Amendment No. 13, 15, 33, 89, 103

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

<u>PENETRATION NUMBER</u>	<u>FUNCTION</u>	<u>INBOARD ISOLATION BARRIER</u>	<u>OUTBOARD ISOLATION BARRIER</u>	<u>MAX. ISOL. TIME. IF APP. (SEC) (26)</u>	<u>ISOL. SIGNAL(S), IF APP. (20)</u>	<u>NOTES</u>	<u>P&ID</u>
054	DRYWELL CHILLED WATER RETURN - LOOP 'A'	HV87-129		60	C,H	11	87
			HV87-121A	60	C,H	11	
			HV87-124A	NA		34	
055	DRYWELL CHILLED WATER SUPPLY - LOOP 'B'	HV87-122		60	C,H	11	87
			HV87-120B	60	C,H	11	
			HV87-125B	NA		34	
056	DRYWELL CHILLED WATER RETURN - LOOP 'B'	HV87-123		60	C,H	11	87
			HV87-121B	60	C,H	11	
			HV87-124B	NA		34	
061-1	RECIRC PUMP 'A' SEAL PURGE	43-1004A(CK)		NA		15	43
			(XV43-103A - SEE PART B, THIS TABLE)	NA		1	
061-2	RECIRC PUMP 'B' SEAL PURGE	43-1004B(CK)		NA		15	43
			(XV43-103B - SEE PART B, THIS TABLE)	NA		1	
062	DRYWELL H2/O2 SAMPLE RETURN, N2 MAKE-UP	SV57-150(X-220A)		5	B,H,R,S	11	57
			SV57-159 (X-220A)	5	B,H,R,S	11	
			HV57-116 (X-220A)	30**	B,H,R,S	11	
			SV57-190 (X-220A)	5	B,H,R,S	11	

LIMERICK - UNIT 1

3/4 6-25

Amendment No. 2, 13, 17, 103

TABLE 3.6.3-1
PRIMARY CONTAINMENT ISOLATION VALVES
NOTATION

NOTES

(Continued)

21. Automatic isolation signal causes TIP to retract; ball valve closes when probe is fully retracted.
22. Isolation barrier remains water filled or a water seal remains in the line post-LOCA. Isolation valve may be tested with water. Isolation valve leakage is not included in 0.60 La total Type B & C tests.
23. Valve does not receive an isolation signal. Valves will be open during Type A test. Type C test not required.
24. Both isolation signals required for valve closure.
25. Deleted
26. Valve stroke times listed are maximum times verified by testing per Specification 4.0.5 acceptance criteria. The closure times for isolation valves in lines in which high-energy line breaks could occur are identified with a single asterisk. The closure times for isolation valves in lines which provide an open path from the containment to the environs are identified with a double asterisk.
27. The reactor vessel head seal leak detection line (penetration 29A) excess flow check valve is not subject to OPERABILITY testing. This valve will not be exposed to primary system pressure except under the unlikely conditions of a seal failure where it could be partially pressurized to reactor pressure. Any leakage path is restricted at the source; therefore, this valve need not be OPERABILITY tested.
28. (DELETED)
29. Valve may be open during normal operation; capable of manual isolation from control room. Position will be controlled procedurally.
30. Valve normally open, closes on scram signal.
31. Valve 41-1016 is an outboard isolation barrier for penetrations X-9A, B and X-44. Leakage through valve 41-1016 is included in the total for penetration X-44 only.
32. Feedwater long-path recirculation valves are sealed closed whenever the reactor is critical and reactor pressure is greater than 600 psig. The valves are expected to be opened only in the following instances:
- a. Flushing of the condensate and feedwater systems during plant startup.
 - b. Reactor pressure vessel hydrostatic testing, which is conducted following each refueling outage prior to commencing plant startup.
- Therefore, valve stroke timing in accordance with Specification 4.0.5 is not required.
33. Valve also constitutes a Unit 2 Reactor Enclosure Secondary Containment Automatic Isolation Valve and a Refueling Area Secondary Containment Automatic Isolation Valve as shown in Table 3.6.5.2.1-1 and Table 3.6.5.2.2-1 respectively.
34. Auto isolation signals have been removed from HV-087-124 A/B and 125 A/B. Valves to be closed with associated circuit breakers locked open during OPCONs 1, 2, and 3.



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. 67
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 January 27, 1995, as supplemented October 10, 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.

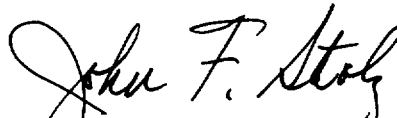
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 67, 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, to 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: October 30, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 67

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.

Remove

3/4 6-24

3/4 6-25

3/4 6-43

Insert

3/4 6-24

3/4 6-25

3/4 6-43

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

PENETRATION NUMBER	FUNCTION	INBOARD ISOLATION BARRIER	OUTBOARD ISOLATION BARRIER	MAX. ISOL. TIME. IF APP. (SEC) (26)	ISOL. SIGNAL(S), IF APP. (20)	NOTES	P&ID
040G-1	ILRT DATA ACQUISITION	60-2057	60-2058	NA NA		11 11	60
040G-2	ILRT DATA ACQUISITION	60-2071	60-2070	NA NA		11 11	60
040H-1	CONTAINMENT INSTRUMENT GAS SUPPLY - HEADER 'A'	59-2005A(CK)	HV59-229A	NA 7	C,H,S		59
042	STANDBY LIQUID CONTROL	48-2F007(CK) (X-116)	HV48-2F006A	NA 60		29	48
043B	MAIN STEAM SAMPLE	HV41-2F084	HV41-2F085	10 10	B B		41
044	RWCU ALTERNATE RETURN	41-2017	41-2016(X-9A, X-9B) PSV41-212	NA NA NA		5,31	41
045A(B,C,D)	LPCI INJECTION 'A' (B,C,D)	HV51-2F041A(B,C, D)(CK) HV51-242A(B,C, D)	HV51-2F017A (B,C,D)	NA 7 38		9,22 9,22	51
050A-1	DRYWELL PRESSURE INSTRUMENTATION		HV42-247B	45		10	42
053	DRYWELL CHILLED WATER SUPPLY - LOOP 'A'	HV87-228	HV87-220A HV87-225A	60 60 NA	C,H C,H	11 11 35	87

LIMERICK - UNIT 2

3/4 6-24

Amendment No. 82,67

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

<u>PENETRATION NUMBER</u>	<u>FUNCTION</u>	<u>INBOARD ISOLATION BARRIER</u>	<u>OUTBOARD ISOLATION BARRIER</u>	<u>MAX. ISOL. TIME IF APP. (SEC) (26)</u>	<u>ISOL. SIGNAL(S), IF APP. (20)</u>	<u>NOTES</u>	<u>P&ID</u>
054	DRYWELL CHILLED WATER RETURN - LOOP 'A'	HV87-229		60	C,H	11	87
			HV87-221A	60	C,H	11	
			HV87-224A	NA		35	
055	DRYWELL CHILLED WATER SUPPLY - LOOP 'B'	HV87-222		60	C,H	11	87
			HV87-220B	60	C,H	11	
			HV87-225B	NA		35	
056	DRYWELL CHILLED WATER RETURN - LOOP 'B'	HV87-223		60	C,H	11	87
			HV87-221B	60	C,H	11	
			HV87-224B	NA		35	
061-1	RECIRC PUMP 'A' SEAL PURGE	43-2004A(CK)	(XV43-203A - SEE PART B, THIS TABLE)	NA NA		15 1	43
061-2	RECIRC PUMP 'B' SEAL PURGE	43-2004B(CK)	(XV43-203B - SEE PART B, THIS TABLE)	NA NA		15 1	43
062	DRYWELL H2/O2 SAMPLE RETURN, N2 MAKE-UP	SV57-250(X-220A)		5	B,H,R,S	11	57
			SV57-259 (X-220A)	5	B,H,R,S	11	
			HV57-216 (X-220A)	30**	B,H,R,S	11	
			SV57-290 (X-220A)	5	B,H,R,S	11	

LIMERICK - UNIT 2

3/4 6-25

Amendment No. 67

TABLE 3.6.3-1
PRIMARY CONTAINMENT ISOLATION VALVES
NOTATION

NOTES

- (Continued)
21. Automatic isolation signal causes TIP to retract; ball valve closes when probe is fully retracted.
 22. Isolation barrier remains water filled or a water seal remains in the line post-LOCA. Isolation valve may be tested with water. Isolation valve leakage is not included in 0.60 La total Type B & C tests.
 23. Valve does not receive an isolation signal. Valves will be open during Type A test. Type C test not required.
 24. Both isolation signals required for valve closure.
 25. Deleted
 26. Valve stroke times listed are maximum times verified by testing per Specification 4.0.5 acceptance criteria. The closure times for isolation valves in lines in which high-energy line breaks could occur are identified with a single asterisk. The closure times for isolation valves in lines which provide an open path from the containment to the environs are identified with a double asterisk.
 27. The reactor vessel head seal leak detection line (penetration 29A) excess flow check valve is not subject to OPERABILITY testing. This valve will not be exposed to primary system pressure except under the unlikely conditions of a seal failure where it could be partially pressurized to reactor pressure. Any leakage path is restricted at the source; therefore, this valve need not be OPERABILITY tested.
 28. (DELETED)
 29. Valve may be open during normal operation; capable of manual isolation from control room. Position will be controlled procedurally.
 30. Valve normally open, closes on scram signal.
 31. Valve 41-2016 is an outboard isolation barrier for penetrations X-9A, B and X-44. Leakage through valve 41-2016 is included in the total for penetration X-44 only.
 32. Feedwater long-path recirculation valves are sealed closed whenever the reactor is critical and reactor pressure is greater than 600 psig. The valves are expected to be opened only in the following instances:
 - a. Flushing of the condensate and feedwater systems during plant startup.
 - b. Reactor pressure vessel hydrostatic testing, which is conducted following each refueling outage prior to commencing plant startup.Therefore, valve stroke timing in accordance with Specification 4.0.5 is not required.
 33. Valve also constitutes a Unit 1 Reactor Enclosure Secondary Containment Automatic Isolation Valve and a Refueling Area Secondary Containment Automatic Isolation Valve as shown in Table 3.6.5.2.1-1 and Table 3.6.5.2.2-1, respectively.
 34. Isolation signal causes recombiner to trip; valve closes when recombiner is not operating.
 35. Auto isolation signals have been removed from HV-087-224 A/B and 225 A/B. Valves to be closed with associated circuit breakers locked open during OPCONS 1, 2, and 3.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 103 AND 67 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 January 27, 1995, as supplemented October 10, 1995, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested changes would eliminate the operability requirements associated with the containment isolation function of certain valves installed in the Drywell Chilled Water System (DCWS). The supplemental letter made editorial corrections to Table 3.6.3-1, for Unit 1 only, and did not change the initial proposed no significant hazards consideration determination and was not outside of the scope of the Federal Register notice.

2.0 EVALUATION

The DCWS in each unit supplies chilled water at 50°F temperature for equipment cooling inside the primary containment. This equipment includes unit air coolers' coils, the sump drain cooling coil, recirculation pump motor air coolers, drywell equipment drain sump cooling coil, sample coolers and vacuum pump seal cooler. The DCWS also supplies cooling to other equipment outside the drywell. The DCWS has a backup (non-chilled) water supply from the Reactor Enclosure Cooling Water (RECW) System. Neither the DCWS or RECW System is safety-grade. In the event of an accident, containment cooling is provided by the Engineered Safety Feature, containment heat removal systems. The DCWS/RECW containment penetrations are arranged as shown in the enclosed figure.

The valves identified as "224" and "225" in the attached drawing (four valves per unit) are classified as containment isolation valves and have maximum allowable closure time limits specified in the Technical Specifications for plant operations in Modes 1, 2 and 3. The licensee proposes to remove the automatic isolation relays for these valves and to lock the valve operator circuit breakers in the open position. The relays to be removed are devices which, when deenergized by an automatic isolation signal, cause the valve operators to close the valves if they are open. These modifications, along with administrative controls, will preclude the valves being open during Modes 1, 2 and 3. Thus the automatic closure feature will be unnecessary. The

valves will remain classified as isolation valves since they will still have a passive isolation function. The deenergization of the valve operator power source makes each valve a passive "sealed-closed barrier" as defined in Standard Review Plan Section 6.2.4, paragraph II.f. This eliminates the need for operability and surveillance testing of the automatic closure feature. The effect of locking open the valve operator circuit breakers removes the RECW system as a backup water supply. This is acceptable since both systems are non-safety. However, all aspects of Appendix J leak testing requirements of these two valves will remain in effect.

The licensee's modifications will eliminate the "active safety function to close" feature of the "224" and "225" valves. This feature can be eliminated because the RECW backup water supply to the DCWS system is not a safety requirement. As a result of eliminating the active isolation feature, the TS operability and surveillance requirements associated with automatic isolation are unnecessary. Therefore, based on the staff's review, the licensee's modifications are 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 (60 FR 20524). 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.

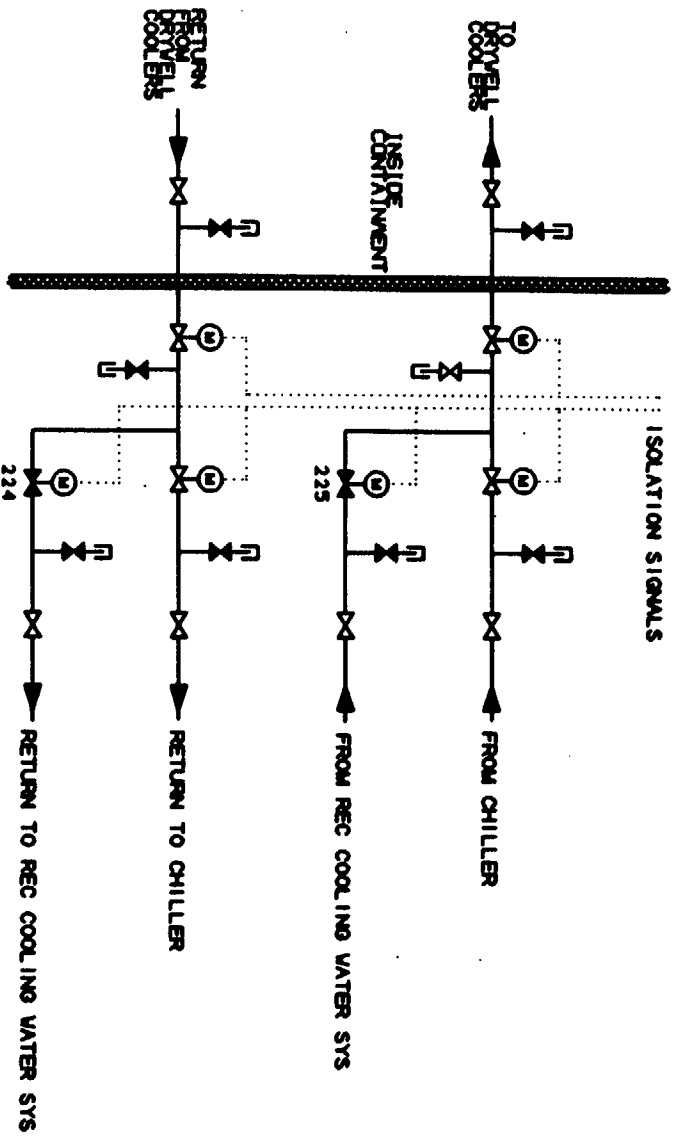
5.0 CONCLUSION

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: W. Long

Attachment: Drawing-Drywell Chilled System Penetrations

Date: October 30, 1995



DRYWELL CHILLED WATER SYSTEM PENETRATIONS
(TYPICAL)