May 13, 1999

Mr. Garrett D. Edwards
Director-Licensing, MC 62
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 - ISSUANCE OF AMENDMENT RE: DISCREPANCY RESOLUTION BETWEEN GENE SPECIFICATION FOR POWER SUPPLY MONITORING RELAYS AND EXISTING TECHNICAL SPECIFICATION ALLOWABLE VALUES (TAC NOS. M3991 AND MA3992)

Dear Mr. Edwards:

The Commission has issued the enclosed Amendment No. 134 to Facility Operating License No. NPF-39 and Amendment No. 96 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 October 30, 1998, as supplemented February 22, 1999.

These amendments revise the overvoltage, undervoltage, and underfrequency allowable values associated with the reactor protection system monitoring channels and add supporting details to the Technical Specification Bases 3/4.8.4.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

This completes our efforts on this issue, and we are, therefore, closing out TAC Nos. MA3991 and MA3992.

Sincerely,
Original signed by:
Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures: 1. Amendment No. 134 to License No. NPF-39
2. Amendment No. 96 to License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

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May 13, 1999

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Director-Licensing, MC 6.__1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 13, 1999

Mr. Garrett D. Edwards
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 - ISSUANCE OF AMENDMENT RE: DISCREPANCY RESOLUTION BETWEEN GENE SPECIFICATION FOR POWER SUPPLY MONITORING RELAYS AND EXISTING TECHNICAL SPECIFICATION ALLOWABLE VALUES (TAC NOS. M3991 AND MA3992)

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These amendments revise the overvoltage, undervoltage, and underfrequency allowable values associated with the reactor protection system monitoring channels and add supporting details to the Technical Specification Bases 3/4.8.4.

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Bartholomew C. Buckley

Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures: 1. Amendment No. 134 to License No. NPF-39
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cc w/encls: See next page

cc:

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Sr. V.P. & General Counsel
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Dr. Judith Johnsrud
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Sierra Club
433 Orlando Avenue
State College, PA 16803

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

PECO ENERGY COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 134
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by PECO Energy Company (the licensee) dated October 30, 1998, as supplemented February 22, 1999, 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. 134 , are hereby incorporated into this license. PECO Energy 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

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: May 13, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 134

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
3/4 8-28	3/4 8-28
B 3/4 8-3	B 3/4 8-3

ELECTRICAL POWER SYSTEMS

REACTOR PROTECTION SYSTEM ELECTRICAL POWER MONITORING

LIMITING CONDITION FOR OPERATION

3.8.4.3 Two reactor protection system (RPS) electric power monitoring channels for each inservice RPS Inverter or alternate power supply shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

a. With one RPS electric power monitoring channel for an inservice RPS Inverter or alternate power supply inoperable, restore the inoperable power monitoring channel to OPERABLE status within 72 hours or remove the associated RPS Inverter or alternate power supply from service.

b. With both RPS electric power monitoring channels for an inservice RPS Inverter or alternate power supply inoperable, restore at least one electric power monitoring channel to OPERABLE status within 24 hours or remove the associated RPS Inverter or alternate power supply from service.

SURVEILLANCE REQUIREMENTS

4.8.4.3 The above specified RPS electric power monitoring channels shall be determined OPERABLE:

a. By performance of a CHANNEL FUNCTIONAL TEST each time the plant is in COLD SHUTDOWN for a period of more than 24 hours, unless performed in the previous 6 months.

b. At least once per 24 months by demonstrating the OPERABILITY of overvoltage, undervoltage, and underfrequency protective instrumentation by performance of a CHANNEL CALIBRATION including simulated automatic actuation of the protective relays, tripping logic, and output circuit breakers and verifying the following Allowable Values.

   1. Overvoltage $\leq$ 127.6 VAC,

   2. Undervoltage $\geq$ 110.7 VAC,

   3. Underfrequency $\geq$ 57.05 Hz.

3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES

Bypassing motor operated valves thermal overload protection ensures that the thermal overload protection will not prevent safety related valves from performing their function. For motor operated valves with spring return-to-center control switches, the thermal overload is bypassed by the automatic control signals associated with the Class 1E valves. For Class 1E motor operated valves with maintained contact control switches, the thermal overloads do not interrupt the valve motor power circuit, but they alarm on an overload condition in the control room. The Surveillance Requirements for demonstrating the bypassing of the thermal overload protection continuously are met by functionally testing the automatic operation of the motor operated valve and ensuring that the motor thermal overload protection design does not change and is in accordance with Regulatory Guide 1.106 "Thermal Overload Protection for Electric Motors on Motor Operated Valves", Revision 1, March 1977.

The RPS Electric Power Monitoring System is provided to isolate the RPS bus from the RPS/UPS inverter or an alternate power supply in the event of overvoltage, undervoltage, or underfrequency. This system protects the loads connected to the RPS bus from unacceptable voltage and frequency conditions. The essential equipment powered from the RPS buses includes the RPS logic, scram solenoids, and valve isolation logic.

The Allowable Values are derived from equipment design limits, corrected for calibration and instrument errors. The trip setpoints are then determined, accounting for the remaining instrument errors (e.g., drift). The trip setpoints derived in this manner provide adequate protection and include allowances for instrumentation uncertainties, calibration tolerances, and instrument drift.

The Allowable Values for the instrument settings are based on the RPS providing power within the design ratings of the associated RPS components (e.g., RPS logic, scram solenoids). The most limiting voltage requirement and associated line losses determine the settings of the electric power monitoring instrument channels.

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

PECO ENERGY COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 96
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by PECO Energy Company (the licensee) dated October 30, 1998, as supplemented February 22, 1999, 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. 96 , are hereby incorporated in the license. PECO Energy 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

James W. Clifford

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: May 13, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 96

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
3/4 8-28	3/4 8-28
B 3/4 8-3	B 3/4 8-3

ELECTRICAL POWER SYSTEMS

REACTOR PROTECTION SYSTEM ELECTRICAL POWER MONITORING

LIMITING CONDITION FOR OPERATION

3.8.4.3 Two reactor protection system (RPS) electric power monitoring channels for each inservice RPS Inverter or alternate power supply shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

a. With one RPS electric power monitoring channel for an inservice RPS Inverter or alternate power supply inoperable, restore the inoperable power monitoring channel to OPERABLE status within 72 hours or remove the associated RPS Inverter or alternate power supply from service.

b. With both RPS electric power monitoring channels for an inservice RPS Inverter or alternate power supply inoperable, restore at least one electric power monitoring channel to OPERABLE status within 24 hours or remove the associated RPS Inverter or alternate power supply from service.

SURVEILLANCE REQUIREMENTS

4.8.4.3 The above specified RPS electric power monitoring channels shall be determined OPERABLE:

a. By performance of a CHANNEL FUNCTIONAL TEST each time the plant is in COLD SHUTDOWN for a period of more than 24 hours, unless performed in the previous 6 months.

b. At least once per 24 months by demonstrating the OPERABILITY of overvoltage, undervoltage, and underfrequency protective instrumentation by performance of a CHANNEL CALIBRATION including simulated automatic actuation of the protective relays, tripping logic, and output circuit breakers and verifying the following Allowable Values.

   1. Overvoltage $\leq$ 127.6 VAC,

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   3. Underfrequency $\geq$ 57.05 Hz.

3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES

Bypassing motor operated valves thermal overload protection ensures that the thermal overload protection will not prevent safety related valves from performing their function. For motor operated valves with spring return-to-center control switches, the thermal overload is bypassed by the automatic control signals associated with the Class 1E valves. For Class 1E motor operated valves with maintained contact control switches, the thermal overloads do not interrupt the valve motor power circuit, but they alarm on an overload condition in the control room. The Surveillance Requirements for demonstrating the bypassing of the thermal overload protection continuously are met by functionally testing the automatic operation of the motor operated valve and ensuring that the motor thermal overload protection design does not change and is in accordance with Regulatory Guide 1.106 "Thermal Overload Protection for Electric Motors on Motor Operated Valves", Revision 1, March 1977.

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The Allowable Values are derived from equipment design limits, corrected for calibration and instrument errors. The trip setpoints are then determined, accounting for the remaining instrument errors (e.g., drift). The trip setpoints derived in this manner provide adequate protection and include allowances for instrumentation uncertainties, calibration tolerances, and instrument drift.

The Allowable Values for the instrument settings are based on the RPS providing power within the design ratings of the associated RPS components (e.g., RPS logic, scram solenoids). The most limiting voltage requirement and associated line losses determine the settings of the electric power monitoring instrument channels.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 134 AND 96 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PECO ENERGY COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated October 30, 1998, as supplemented February 22, 1999, the PECO Energy Company (the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TSs). The requested changes would revise the overvoltage (OV), undervoltage (UV), and underfrequency (UF) allowable values associated with the reactor protection system monitoring channels and add supporting details to the Technical Specification Bases 3/4.8.4. The February 22, 1999, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 DISCUSSION

The Reactor Protection System (RPS) Monitoring System protects the loads connected to the RPS bus from unacceptable voltage and frequency conditions. The system isolates the RPS bus from the RPS/UPS (uninterrupted power supply) inverter or an alternate power supply in the event of overvoltage, undervoltage, or underfrequency. The RPS buses power the RPS logic, scram solenoids, and valve isolation logic. The TS Surveillance Requirements 4.8.4.3.b.1, 4.8.4.3.b.2, and 4.8.4.3.b.3 list the OV, UV, and UF allowable values for the protective instrumentation for the RPS electric monitoring channels. During a revision to a calculation for an RPS Breaker Panel - RPS/UPS system bus relay settings, the licensee discovered a discrepancy between existing TS 4.8.4.3 and General Electric (GE) Design Specification 22A3083AB. By letter dated October 30, 1998, as supplemented February 22, 1999, the licensee requested approval of the TS change to revise the allowable values listed in TS 4.8.4.3 and add supporting details in the TS Bases Section 3/4.8.4.

3.0 EVALUATION

The proposed change corrects a discrepancy between the GE Design Specification for power supply monitoring relays and the existing TS allowable values listed in TS 4.8.4.3. Currently, TS 4.8.4.3 identifies the required values for the RPS electric monitoring relays; OV, UV, and UF. The licensee's investigation into the licensing basis identified nominal values of +/- 10% of 120 Vac and -5% of 60 Hz for the allowable values. These values are included in NUREG-0123, from which the TSs for Limerick were developed.

The existing TS values are as follows:

Overvoltage ≤ 132Vac
Undervoltage ≥ 109Vac
Underfrequency ≥ 57Hz

The proposed TS values are as follows:

Overvoltage ≤ 127.5Vac
Undervoltage ≥ 110.7Vac
Underfrequency ≥ 57.05Hz

The GE Design Specification 22A3083AB provides the criteria for setting the respective relays to ensure critical RPS components are not subjected to abnormal voltages and frequency. Part of this methodology is to include voltage drops between the relays and the components. This guidance was not previously included in the calculation of allowable values for OV and UV. When the voltage drops are added into the current TS allowable values for OV and UV relays, the resultant voltages were not adequate to protect the RPS electrical components. The allowable value is the maximum (or minimum) value at which the instrument may be set, which will assure its actuation prior to a parameter exceeding the design limit (DL). OV DL and UV DL are determined based on the requirements of GE Spec 22A3083, which include the voltage drops. OV DL and UV DL thus calculated are ≤ 128.5Vac for OV and ≥109.8Vac for UV. The new allowable values are determined by including relay accuracy (RA) and calibration accuracy (CA) in their calculations. CA refers to errors introduced by the inaccuracies of calibrating equipment and the allowances for error introduced by the calibration procedures. After subtracting CA and RA values (0.87V) from OV DL (128.5V), the allowable value for OV is ≤ 127.6Vac. Similarly, after adding CA and RA values (0.86V) to UV DL (109.8V), the allowable value for UV is ≥ 110.7Vac. DL for UF is 57 HZ (60 Hz - 5%). Similarly, after adding CA and RA values (0.05 Hz) to UF DL (57 HZ), the allowable value for UF is ≥ 57.05 HZ. The allowable value is listed in the TS. The proposed changes bring the TSs into agreement with plant design specifications and will ensure that adequate protection is provided for RPS components.

The proposed change also includes an addition to the TS Bases Section 3/4.8.4 providing details as to how the allowable values are derived and the basis for the instrument settings.

Summary

The staff concludes the following:

1. The proposed TS change provides more conservative allowable values for OV, UV, and UF.

2. The proposed change brings the TSs into agreement with GE Design Specifications and will assure that adequate protection continues to be provided for the RPS components.

Based on the NRC staff review of the licensee's submittals, the staff finds the proposed changes to the TS and the associated Bases acceptable.

4.0 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.

5.0 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 change 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 (63 FR 64120). 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.

6.0 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: N. Trehan
B. Buckley

Date: May 13, 1999