

January 27, 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 CONTROLS FOR A REMOTE SHUTDOWN SYSTEM CONTROL VALVE AND DELETION OF ISOLATION SIGNAL FOR CERTAIN PRIMARY CONTAINMENT ISOLATION VALVES, LIMERICK GENERATING STATION, UNIT 2 (TAC NO. M89914)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 47 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Unit 2. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated June 30, 1994.

This amendment removes the controls for a remote shutdown system control valve and the primary containment isolation valves from TS Tables 3.3.7.4-1 and 3.6.3-1 respectively, as a result of eliminating the steam condensing mode of the Residual Heat Removal system. You are requested to notify the NRC when the amendment has been implemented.

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 No. 50-353

Enclosures:

- Amendment No. 47 to License No. NPF-85
- Safety Evaluation

cc w/encls:  
See next page

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

January 27, 1995

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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, appearing to read "Frank Rinaldi".

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

Docket No. 50-353

Enclosures:

1. Amendment No. 47 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. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 47  
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 June 30, 1994, 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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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. <sup>47</sup>, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: January 27, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 47

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

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

Remove

3/4 3-80

3/4 6-29

3/4 6-30

Insert

3/4 3-80

3/4 6-29

3/4 6-30

Table 3.3.7.4-1 (Continued)

RHR SYSTEM (Continued)

HV-43-2F023A	Control-Recirculation pump A suction valve
HSS-43-291	Control-Transfer switch
HV-51-2F007A	Control-2A RHR pump minimum flow bypass valve
HV-51-2F048A	Control-2A heat exchanger shell side bypass
HV-51-2F015A	Control-2A shutdown cooling injection valve
HV-51-2F016A	Control-Reactor containment spray
HV-51-2F017A	Control-2A RHR loop injection valve
HV-51-2F024A	Control-2A RHR loop test return
HV-51-2F027A	Control-Suppression pool sparger isolation
HV-51-2F047A	Control-2A Heat exchanger shell side inlet
HV-51-2F003A	Control-2A Heat exchanger shell side outlet
HV-51-2F049	Control-RHR Discharge to radwaste outboard isolation
HV-51-225A	Control-2A/2C test return line to suppression pool

RHR SERVICE WATER SYSTEM

HSS-12-015A-2	Control-Spray pond/cooling tower select
HSS-12-015C-2	Control-Spray pond/cooling tower select
HSS-12-016A-2	Control-Spray/bypass select
HSS-12-016C-2	Control-Spray/bypass select

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
226A	RHR MINIMUM RECIRC		HV51-205A	40		4,22,29	51
226B	RHR MINIMUM RECIRC		HV51-205B	40		4,22,29	51
227	ILRT DATA ACQUISITION SYSTEM	60-2073	60-2074	NA NA			60
228D	HPCI VACUUM RELIEF	HV55-2F095	HV55-2F093	40 40	H, LA H, LA	4,11,24 11,24	55
229A	INSTRUMENTATION - SUPPRESSION POOL PRESSURE SUPPRESSION POOL LEVEL	--	SV57-201	5		10	57
230B	INSTRUMENTATION - DRYWELL SUMP LEVEL	--	HV61-212 HV61-232	45 45		23,29 23,29	61
231A	DRYWELL FLOOR DRAIN SUMP DISCHARGE	HV61-210	HV61-211	30 30	B,H B,H	11,22 11,22	61
231B	DRYWELL EQUIPMENT DRAIN TANK DISCHARGE	HV61-230	HV61-231	30 30	B,H B,H	11,22 11,22	61
235	CS PUMP MINIMUM RECIRC		HV52-2F031A	45	LFCH	5,22,29	52
236	HPCI PUMP MINIMUM RECIRC		HV55-2F012	15	LFHP	5,22	55



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
237-1	SUPPRESSION POOL CLEANUP PUMP SUCTION	HV52-227		60	B,H	4,11,22	52
			PSV52-227	NA		11,22	
237-2	SUPPRESSION POOL LEVEL INSTRUMENTATION		HV52-239	45		10	52
			SV52-239	6		10	
238	RHR RELIEF VALVE DISCHARGE		HV-C-51-2F104B	18	C,G		51
			PSV51-206B	NA		19	
239	RHR RELIEF VALVE DISCHARGE		HV-C-51-2F103A	18	C,G		51
			PSV51-206A	NA		19	
241	RCIC VACUUM RELIEF	HV49-2F084		40	H,KA	4,11,24	49
			HV49-2F080	40	H,KA	11,24	



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED AMENDMENT NO. 47 TO FACILITY OPERATING LICENSE NO. NPF-85  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNIT 2  
DOCKET NO. 50-353

1.0 INTRODUCTION

By letter dated June 30, 1994, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station, Unit 2, Technical Specifications (TS). The requested changes would remove the controls for a remote shutdown system control valve and the primary containment isolation valves from TS Tables 3.3.7.4-1 and 3.6.3-1 respectively, as a result of eliminating the steam condensing mode of the Residual Heat Removal (RHR) system.

2.0 EVALUATION

The steam condensing mode of the RHR system has never been used at LGS, Unit 1 or Unit 2. Currently, a portion of the components associated with the Steam Condensing Mode are abandoned in place, which renders this mode inoperable. However, the routine preventive maintenance and surveillance tests are continually required to be performed. Hence, the licensee proposed to have the remainder of the steam condensing mode components removed from service at LGS, Unit 2 during the upcoming third Unit 2 refueling outage beginning on January 28, 1995, to eliminate the need to test and perform maintenance on these components. Similar amendments have been issued to LGS Unit 1, as authorized by Amendment No. 65 and Amendment No. 74.

The following remote shutdown system control valves will be removed from TS Table 3.3.7.4-1:

- RHR heat exchanger discharge line to suppression pool valve:  
HV-51-2F011A
- RHR heat exchanger discharge line to Reactor Core Isolation Cooling (RCIC) system valve:  
HV-51-2F026A
- Steam supply line to RHR heat exchanger valve:  
HV-51-2F052A
- Steam supply line to RHR heat exchanger warm-up bypass valve:  
HV-51-253A

These valves will be abandoned in place, locked closed with its electrical power source removed. The valves' handswitches will be removed from the remote shutdown panel since they will not perform any TS related function.

The licensee has stated that the piping associated with valves HV-51-2F052A and HV-51-253A will be cut and steel plates will be welded at the ends, isolating the RHR system from the HIGH Pressure Coolant Injection (HPCI) system steam supply line. Currently, these valves are not being used in Unit 2, hence the interfacing systems are not impacted. In addition, the operation of RCIC, RHR or HPCI systems will not be affected by these changes.

The licensee has proposed to have the following RHR system, steam condensing mode, pressure safety (i.e. relief) valves (PSVs), physically removed from the plant and replaced by blank flanges:

- PSV-51-201A(B)
- PSV-51-2F055A(B)
- PSV-51-2F097

Primary containment penetration X-240, associated with valve PSV-51-2F097, will be capped and incorporated as a part of the primary containment structure. The portion of piping between the primary containment and the flanges replacing the above PSVs will not be affected, and will continue to meet the original design requirements.

The following RHR vacuum relief suction valves, a portion of Primary Containment Isolation Valves (PCIVs) in Table 3.6.3-1, will be removed:

- HV51-230
- HV51-231

The RHR vacuum relief suction inboard PCIV, HV51-230, and the associated piping leading up to the associated outboard PCIV, HV51-231, will be physically removed from the plant. Valve HV51-231 will be abandoned in place, in the closed position with the electrical power removed. The associated primary containment penetration, X-225, will be capped, as well as the piping upstream of HV51-231.

These valves are locked closed in their safety-related position with their electrical power source removed. These valves are no longer required to receive an isolation signal or meet valve closure time, but provide manual containment isolation. This valve will no longer be a PCIV following these modifications.

The components associated with the steam condensing mode of the RHR system are seismic Category I, but they are not safety related, based on the Updated Final Safety Analysis Report, for this mode of the RHR. However, the RHR system piping and valves associated with this mode are safety related for pressure and structural integrity. All valves to be removed from service or abandoned in place were provided only for the RHR system steam

condensing mode. The operation or safety-related function of the RHR or HPCI system will not be affected by these changes. The flanges and penetration caps, which will become part of the primary containment boundary, will be periodically tested for leakage in accordance with the primary containment Integrated Leak Rate Testing (ILRT) Program.

In addition, a typographical error in the heading of TS Table 3.6.3-1, page 3/4 6-29, will be revised to note the minimum isolation time. It should have been made to note 26 instead of note 36 as currently shown.

Based on the above, the staff concludes that the proposed changes will not impact the performance of the safety-related function of the RHR system components, and are therefore, acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes 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 amendment involves 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (59 FR 42343). Accordingly, the amendment meets 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 amendment.

### 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: T. Liu

Date: January 27, 1995