

January 12, 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 (TAC NOS. MA3852 AND MA3853)

Dear Mr. Edwards:

The Commission has issued the enclosed Amendment No.133 to Facility Operating License No. NPF-39 and Amendment No. 95 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 15, 1998.

These amendments add a new TS section and TS Bases section to incorporate a special test exception to allow reactor coolant temperatures greater than 200 °F but less than or equal to 212 °F during inservice testing and hydrostatic testing.

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/}
Bartholomew C. Buckley, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-352/353

- Enclosures: 1. Amendment No.133 to License No. NPF-39
- 2. Amendment No. 95 to License No. NPF-85
- 3. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

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|---------------|-----------------|---------------------|
| Docket File | MO'Brien | WBeckner |
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| PDI-2 Reading | OGC | ACRS |
| JZwolinski | GHill(4) | THarris (E-Mail SE) |
| WDean | CCowgill, RGN-I | GBagchi |

*Previously Concurred

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|--------|---------------------|--------------------|----------|----------|----------|---------|
| OFFICE | PDI-2/PM <i>BCB</i> | PDI-2/MA <i>MB</i> | SRXB* | ECGB* | OGC* | PDI-2/D |
| NAME | BBuckley:mw | MO'Brien | TCollins | GBagchi | Suttal | WDean |
| DATE | 1/18/99 | 1/8/99 | 12/17/98 | 12/14/98 | 12/30/98 | 1/12/99 |

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 12, 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

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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 "Bartholomew C. Buckley".

Bartholomew C. Buckley, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-352/353

Enclosures: 1. Amendment No.133 to
License No. NPF-39
2. Amendment No.95 to
License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

**Mr. Garrett D. Edwards
PECO Energy Company**

Limerick Generating Station, Units 1 & 2

cc:

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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. 133
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 15, 1998, 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-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. 133, 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



William M. Dean, 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 12, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 133

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.

| <u>Remove</u> | <u>Insert</u> |
|---------------|---------------|
| xvi | xvi |
| xxii | xxii |
| 1-10 | 1-10 |
| - | 3/4 10-7 |
| - | 3/4 10-8 |
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| The information from pages 3/4 11-1 through 3/4 11-6 has been intentionally omitted. Refer to note on page 3/4 11-1..... | 3/4 11-1 |
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| The information from pages 3/4 11-8 through 3/4 11-14 has been intentionally omitted. Refer to note on page 3/4 11-8..... | 3/4 11-8 |

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| | | |
|----------|---|------------|
| 3/4.11.1 | LIQUID EFFLUENTS | |
| | The information on page B 3/4 11-1 has been intentionally omitted. Refer to note on this page. | B 3/4 11-1 |
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| | (Deleted)..... | B 3/4 11-2 |
| | The information on page B 3/4 11-3 has been intentionally omitted. Refer to note on this page. | B 3/4 11-3 |
| | (Deleted)..... | B 3/4 11-4 |

DEFINITIONS

TABLE 1.2
OPERATIONAL CONDITIONS

| <u>CONDITION</u> | <u>MODE SWITCH POSITION</u> | <u>AVERAGE REACTOR COOLANT TEMPERATURE</u> |
|--------------------|-----------------------------|--|
| 1. POWER OPERATION | Run | Any temperature |
| 2. STARTUP | Startup/Hot Standby | Any temperature |
| 3. HOT SHUTDOWN | Shutdown# *** | > 200°F |
| 4. COLD SHUTDOWN | Shutdown# ## *** | ≤ 200°F **** |
| 5. REFUELING* | Shutdown or Refuel** # | NA |

#The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

##The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Specification 3.9.10.1.

*Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

**See Special Test Exceptions 3.10.1 and 3.10.3.

***The reactor mode switch may be placed in the Refuel position while a single control rod is being recoupled provided that the one-rod-out interlock is OPERABLE.

****See Special Test Exception 3.10.8.

SPECIAL TEST EXCEPTIONS

3/4.10.7 RESERVED-CURRENTLY NOT USED

SPECIAL TEST EXCEPTIONS

3/4.10.8 INSERVICE LEAK AND HYDROSTATIC TESTING

LIMITING CONDITIONS FOR OPERATION

3.10.8 When conducting inservice leak or hydrostatic testing, the average reactor coolant temperature specified in Table 1.2 for OPERATIONAL CONDITION 4 may be increased to 212°F, and operation considered not to be in OPERATIONAL CONDITION 3, to allow performance of an inservice leak or hydrostatic test provided the following OPERATIONAL CONDITION 3 Specifications are met:

- a. 3.3.2 ISOLATION ACTUATION INSTRUMENTATION, Functions 7.a, 7.c.1, 7.c.2 and 7.d of Table 3.3.2-1;
- b. 3.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY;
- c. 3.6.5.1.2 REFUELING AREA SECONDARY CONTAINMENT INTEGRITY;
- d. 3.6.5.2.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES;
- e. 3.6.5.2.2 REFUELING AREA SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES; and
- f. 3.6.5.3 STANDBY GAS TREATMENT SYSTEM.

APPLICABILITY: OPERATIONAL CONDITION 4, with average reactor coolant temperature greater than 200°F and less than or equal to 212°F.

ACTION:

With the requirements of the above Specifications not satisfied:

1. Immediately enter the applicable (OPERATIONAL CONDITION 3) action for the affected Specification; or
2. Immediately suspend activities that could increase the average reactor coolant temperature or pressure and reduce the average reactor coolant temperature to 200°F or less within 24 hours.

SURVEILLANCE REQUIREMENTS

4.10.8 Verify applicable OPERATIONAL CONDITION 3 surveillances for the Specifications listed in 3.10.8 are met.

3/4.10 SPECIAL TEST EXCEPTIONS

BASES

3.4.10.1 PRIMARY CONTAINMENT INTEGRITY

The requirement for PRIMARY CONTAINMENT INTEGRITY is not applicable during the period when open vessel tests are being performed during the low power PHYSICS TESTS.

3/4.10.2 ROD WORTH MINIMIZER

In order to perform the tests required in the technical specifications it is necessary to bypass the sequence restraints on control rod movement. The additional surveillance requirements ensure that the specifications on heat generation rates and shutdown margin requirements are not exceeded during the period when these tests are being performed and that individual rod worths do not exceed the values assumed in the safety analysis.

3/4.10.3 SHUTDOWN MARGIN DEMONSTRATIONS

Performance of shutdown margin demonstrations with the vessel head removed requires additional restrictions in order to ensure that criticality does not occur. These additional restrictions are specified in this LCO.

3/4.10.4 RECIRCULATION LOOPS

This special test exception permits reactor criticality under no flow conditions and is required to perform certain startup and PHYSICS TESTS while at low THERMAL POWER levels.

3/4.10.5 OXYGEN CONCENTRATION

Relief from the oxygen concentration specifications is necessary in order to provide access to the primary containment during the initial startup and testing phase of operation. Without this access the startup and test program could be restricted and delayed.

3/4.10.6 TRAINING STARTUPS

This special test exception permits training startups to be performed with the reactor vessel depressurized at low THERMAL POWER and temperature while controlling RCS temperature with one RHR subsystem aligned in the shutdown cooling mode in order to minimize contaminated water discharge to the radioactive waste disposal system.

3/4.10.7 RESERVED - CURRENTLY NOT USED

3/4.10 SPECIAL TEST EXCEPTIONS

BASES

3/4.10.8 INSERVICE LEAK AND HYDROSTATIC TESTING

This special test exception permits certain reactor coolant pressure tests to be performed in OPERATIONAL CONDITION 4 when the metallurgical characteristics of the reactor pressure vessel (RPV) or plant temperature control capabilities during these tests require the pressure testing at temperatures greater than 200°F and less than or equal to 212°F (normally corresponding to OPERATIONAL CONDITION 3). The additionally imposed OPERATIONAL CONDITION 3 requirements for SECONDARY CONTAINMENT INTEGRITY provide conservatism in response to an operational event.

Inservice hydrostatic testing and inservice leak pressure tests required by Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code are performed prior to the reactor going critical after a refueling outage. The minimum temperatures (at the required pressures) allowed for these tests are determined from the RPV pressure and temperature (P/T) limits required by LCO 3.4.6, Reactor Coolant System Pressure/Temperature Limits. These limits are conservatively based on the fracture toughness of the reactor vessel, taking into account anticipated vessel neutron fluence. With increased reactor fluence over time, the minimum allowable vessel temperature increases at a given pressure. Periodic updates to the RCS P/T limit curves are performed as necessary, based upon the results of analysis of irradiated surveillance specimens removed from the vessel.



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. 95
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 15, 1998, 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. 95 , 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



William M. Dean, 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 12, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 95

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.

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xxii
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Insert

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| 3/4.11.1 LIQUID EFFLUENTS | |
| The information from pages 3/4 11-1 through 3/4 11-6 has been intentionally omitted. Refer to note on page 3/4 11-1..... | 3/4 11-1 |
| Liquid Holdup Tanks..... | 3/4 11-7 |
| 3/4.11.2 GASEOUS EFFLUENTS | |
| The information from pages 3/4 11-8 through 3/4 11-14 has been intentionally omitted. Refer to note on page 3/4 11-8..... | 3/4 11-8 |

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| The information on page B 3/4 11-1 has been intentionally omitted. Refer to note on this page..... | B 3/4 11-1 |
| (Deleted)..... | B 3/4 11-2 |
| Liquid Holdup Tanks..... | B 3/4 11-2 |
| 3/4.11.2 GASEOUS EFFLUENTS | |
| (Deleted)..... | B 3/4 11-2 |
| The information on page B 3/4 11-3 has been intentionally omitted. Refer to note on this page..... | B 3/4 11-3 |
| (Deleted)..... | B 3/4 11-4 |

DEFINITIONS

TABLE 1.2

OPERATIONAL CONDITIONS

| <u>CONDITION</u> | <u>MODE SWITCH POSITION</u> | <u>AVERAGE REACTOR COOLANT TEMPERATURE</u> |
|--------------------|-----------------------------|--|
| 1. POWER OPERATION | Run | Any temperature |
| 2. STARTUP | Startup/Hot Standby | Any temperature |
| 3. HOT SHUTDOWN | Shutdown# *** | > 200°F |
| 4. COLD SHUTDOWN | Shutdown# ## *** | ≤ 200°F **** |
| 5. REFUELING* | Shutdown or Refuel** # | NA |

#The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

##The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Specification 3.9.10.1.

*Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

**See Special Test Exceptions 3.10.1 and 3.10.3.

***The reactor mode switch may be placed in the Refuel position while a single control rod is being recoupled provided that the one-rod-out interlock is OPERABLE.

****See Special Test Exception 3.10.8.

SPECIAL TEST EXCEPTIONS

3/4.10.8 INSERVICE LEAK AND HYDROSTATIC TESTING

LIMITING CONDITION FOR OPERATION

3.10.8 When conducting inservice leak or hydrostatic testing, the average reactor coolant temperature specified in Table 1.2 for OPERATIONAL CONDITION 4 may be increased to 212°F, and operation considered not to be in OPERATIONAL CONDITION 3, to allow performance of an inservice leak or hydrostatic test provided the following OPERATIONAL CONDITION 3 Specifications are met:

- a. 3.3.2 ISOLATION ACTUATION INSTRUMENTATION, Functions 7.a, 7.c.1, 7.c.2 and 7.d of Table 3.3.2-1;
- b. 3.6.5.1.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT INTEGRITY;
- c. 3.6.5.1.2 REFUELING AREA SECONDARY CONTAINMENT INTEGRITY;
- d. 3.6.5.2.1 REACTOR ENCLOSURE SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES;
- e. 3.6.5.2.2 REFUELING AREA SECONDARY CONTAINMENT AUTOMATIC ISOLATION VALVES; and
- f. 3.6.5.3 STANDBY GAS TREATMENT SYSTEM.

APPLICABILITY: OPERATIONAL CONDITION 4, with average reactor coolant temperature greater than 200°F and less than or equal to 212°F.

ACTION:

With the requirements of the above Specifications not satisfied:

1. Immediately enter the applicable (OPERATIONAL CONDITION 3) action for the affected Specification; or
2. Immediately suspend activities that could increase the average reactor coolant temperature or pressure and reduce the average reactor coolant temperature to 200°F or less within 24 hours.

SURVEILLANCE REQUIREMENTS

4.10.8 Verify applicable OPERATIONAL CONDITION 3 surveillances for the Specifications listed in 3.10.8 are met.

3/4.10 SPECIAL TEST EXCEPTIONS

BASES

3/4.10.8 INSERVICE LEAK AND HYDROSTATIC TESTING

This special test exception permits certain reactor coolant pressure tests to be performed in OPERATIONAL CONDITION 4 when the metallurgical characteristics of the reactor pressure vessel (RPV) or plant temperature control capabilities during these tests require the pressure testing at temperatures greater than 200°F and less than or equal to 212°F (normally corresponding to OPERATIONAL CONDITION 3). The additionally imposed OPERATIONAL CONDITION 3 requirements for SECONDARY CONTAINMENT INTEGRITY provide conservatism in response to an operational event.

Inservice hydrostatic testing and inservice leak pressure tests required by Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code are performed prior to the reactor going critical after a refueling outage. The minimum temperatures (at the required pressures) allowed for these tests are determined from the RPV pressure and temperature (P/T) limits required by LCO 3.4.6, Reactor Coolant System Pressure/Temperature Limits. These limits are conservatively based on the fracture toughness of the reactor vessel, taking into account anticipated vessel neutron fluence. With increased reactor fluence over time, the minimum allowable vessel temperature increases at a given pressure. Periodic updates to the RCS P/T limit curves are performed as necessary, based upon the results of analysis of irradiated surveillance specimens removed from the vessel.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 133 AND 95 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 15, 1998, the licensee submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2 Technical Specifications (TS). The proposed amendments would add a new TS section and a new TS Bases to incorporate a special test exception to allow inservice testing (IST) and hydrostatic testing to be performed in OPERATIONAL CONDITION (OPCON) 4 (i.e., Cold Shutdown) when the average reactor coolant temperature exceeds 200 °F and is less than or equal to 212 °F, which normally corresponds to OPCON 3 (i.e., Hot Shutdown). The proposed TS changes are based on the Section 3.10.1 of NUREG-1433, Revision 1, "Standard Technical Specifications, General Electric Plants, BWR/4," dated April 1995, except that a 212 °F temperature limit has been specified.

2.0 BACKGROUND

Inservice hydrostatic testing and inservice leak pressure tests required by Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code are performed prior to the reactor going critical after a refueling outage. The minimum temperatures (at the required pressures) allowed for these tests are determined from the reactor pressure vessel (RPV) pressure and temperature (P/T) limits required by Limiting Condition for Operation (LCO) 3.4.6, Reactor Coolant System Pressure/Temperature Limits. These limits are based on the fracture toughness of the reactor vessel, taking into account anticipated vessel neutron fluence. With increased reactor fluence over time, the minimum allowable vessel temperature increases at a given pressure. Periodic updates to the reactor coolant system (RCS) P/T limit curves are performed as necessary, based upon the results of analysis of irradiated surveillance specimens removed from the vessel.

The proposed TS changes involve adding a new TS section and supporting Bases to the LGS, Units 1 and 2, TS to include provisions for a Special Test Exception. New LCO requirements will be established for Unit 1 (i.e., TS Section 3/4.10.8) and Unit 2 (i.e., TS Section 3/4.10.8) which specify that the average reactor coolant water temperature in TS Table 1.2 for OPCON 4 may be increased to 212 °F, and that operation is not considered to be in OPCON 3, in order to allow performance of inservice leak and hydrostatic testing, provided the following OPCON 3 LCOs are met:

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1. LCO 3.3.2 Isolation Actuation Instrumentation, Table 3.3.2-1, Functions 7.a, 7.c.1, 7.c.2, and 7.d;
2. LCO 3.6.5.1.1 Reactor Enclosure Secondary Containment Integrity;
2. LCO 3.6.5.1.2 Refueling Area Secondary Containment Integrity;
4. LCO 3.6.5.2.1 Reactor Enclosure Secondary Containment Automatic Isolation Valves;
5. LCO 3.6.5.2.2 Refueling Area Secondary Containment Automatic Isolation Valves; and
6. LCO 3.6.5.3 Standby Gas Treatment System.

The Applicability of the proposed LCO is OPCON 4 with average reactor coolant water temperature greater than 200 °F and less than or equal to 212 °F.

New TS Bases Section B 3/4.10.8 (Unit 1) and B 3/4.10.8 (Unit 2) will also be added in support of the new Special Test Exception TS requirements.

In addition, a new TS section and Bases section reference (i.e., 3/4.10.7, B 3/4.10.7) will also be added to the Unit 1 TS only. These TS and Bases sections were added to the Unit 1 TSs in order to maintain consistency in the numbering sequence of the TS sections for Units 1 and 2. These sections contain no information and will be designated as "reserved."

3.0 EVALUATION

The proposed TS changes involve revising TS Section 3/4.10 to include a new Special Test Exception allowing the reactor to be considered in OPCON 4 during inservice leak or hydrostatic testing with a reactor coolant water temperature greater than 200 °F and less than or equal to 212 °F. This is an exception to certain OPCON 3 requirements, including primary containment. The proposed TS changes will permit unrestricted access to the primary containment for the performance of required inspections. The inservice leak or hydrostatic test is performed water solid, or near water solid, when the stored energy in the reactor core is very low and the potential for failed fuel and a subsequent increase in coolant activity above Specification 3/4.4.5 limits are minimal. In addition, the Secondary Containment, which includes automatic isolation dampers and the Standby Gas Treatment System (SGTS), will be operable and capable of handling airborne radioactive material from leaks that could occur during the performance of inservice leak or hydrostatic testing. Airborne radioactive material would not be significant in the event of a leak since there will be little or no flashing (i.e., conversion to steam) of reactor coolant. Requiring the Secondary Containment to be operable will assure that potential airborne radioactive material from leaks will be filtered through the SGTS to limit any radiation releases to the environment.

In the event of a large primary coolant system leak, the reactor vessel would rapidly depressurize, allowing the low pressure core cooling systems (i.e., Low Pressure Coolant Injection (LPCI) and Core Spray (CS)) to operate. The capability of the LPCI and CS systems, as required in OPCON 4 by LCO 3.5.2, "ECCS-Shutdown," would be adequate to keep the core flooded under this low decay heat load condition. Small system leaks would be detected by leakage inspections before significant inventory loss occurred.

Based on the NRC staff's evaluation, it is concluded that the proposed TS changes will assure acceptable consequences of any postulated accidents and are, therefore, acceptable. In addition, the revisions to Bases are consistent with the TS changes.

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 Contributor: B. Buckley

Date: January 12, 1999