

October 1, 1998

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. M98421 and M98422)

Dear Mr. Edwards:

The Commission has issued the enclosed Amendment No. 130 to Facility Operating License No. NPF-39 and Amendment No. 91 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 March 24, 1997, as supplemented September 4, 1998.

These amendments approve the deletion of the Drywell and Suppression Chamber Purge System operational time limit, removal of a footnote regarding 1-inch and 2-inch valves, and the addition of a surveillance requirement ensuring the purge system large supply and exhaust valves are closed as required.

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

This concludes our effort on this issue and we are, therefore, closing out TAC Nos. M98421 and M98422.

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. 130 to License No. NPF-39
- 2. Amendment No. 91 to License No. NPF-85
- 3. Safety Evaluation

cc w/encls: See next page

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Mr. Garrett D. Edwards
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. 130
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 March 24, 1997, as supplemented September 4, 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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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 1, 1998

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. M98421 and M98422)

Dear Mr. Edwards:

The Commission has issued the enclosed Amendment No. 130 to Facility Operating License No. NPF-39 and Amendment No. 91 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 March 24, 1997, as supplemented September 4, 1998.

These amendments approve the deletion of the Drywell and Suppression Chamber Purge System operational time limit, removal of a footnote regarding 1-inch and 2-inch valves, and the addition of a surveillance requirement ensuring the purge system large supply and exhaust valves are closed as required.

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

This concludes our effort on this issue and we are, therefore, closing out TAC Nos. M98421 and M98422.

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 - III
Office of Nuclear Reactor Regulation

Docket Nos. 50-352/353

- Enclosures:
1. Amendment No. 130 to License No. NPF-39
 2. Amendment No. 91 to License No. NPF-85
 3. Safety Evaluation

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.130 , 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

Robert A. Capra

Robert A. Capra, 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 1, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 130

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 6-11

B 3/4 6-2

Insert

3/4 6-11

B 3/4 6-2

CONTAINMENT SYSTEMS

DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the supply and exhaust isolation valves in one supply line and one exhaust line open for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With a drywell and/or suppression chamber purge supply and/or exhaust isolation valve open, except as permitted above, close the valve(s) within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.8 At least once per 31 days, verify each primary containment purge valve [18" or 24"] is closed.*, **

* Only required to be met in OPERATIONAL CONDITIONS 1, 2 and 3.

** Not required to be met when the primary containment purge valves are open for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require these valves to be open.

CONTAINMENT SYSTEMS

BASES

3/4.6.1.5 PRIMARY CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the unit. Structural integrity is required to ensure that the containment will withstand the maximum calculated pressure in the event of a LOCA. A visual inspection in accordance with the Primary Containment Leakage Rate Testing Program is sufficient to demonstrate this capability.

3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitations on drywell and suppression chamber internal pressure ensure that the calculated containment peak pressure does not exceed the design pressure of 55 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5.0 psid. The limit of - 1.0 to + 2.0 psig for initial containment pressure will limit the total pressure to ≤ 44 psig which is less than the design pressure and is consistent with the safety analysis.

3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during steam line break conditions and is consistent with the safety analysis.

3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open. Limiting the use of the drywell and suppression chamber purge system to specific criteria is imposed to protect the integrity of the SGTS filters. Analysis indicates that should a LOCA occur while this pathway is being utilized, the associated pressure surge through the (18 or 24") purge lines will adversely affect the integrity of SGTS. This condition is not imposed on the 1 and 2 inch valves used for pressure control since a surge through these lines does not threaten the operability of SGTS.

Surveillance requirement 4.6.1.8 ensures that the primary containment purge valves are closed as required or, if open, open for an allowable reason. If a purge valve is open in violation of this SR, the valve is considered inoperable. The SR is modified by a Note stating that primary containment purge valves are only required to be closed in OPERATIONAL CONDITIONS 1, 2 and 3. The SR is also modified by a Note stating that the SR is not required to be met when the purge valves are open for the stated reasons. The Note states that these valves may be opened for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open. The 18 or 24 inch purge valves are capable of closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency is consistent with other PCIV requirements.



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.91
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 March 24, 1997, as supplemented September 4, 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. 91, are hereby incorporated in the 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

Robert A. Capra

Robert A. Capra, 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 1, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 91

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 6-11

B 3/4 6-2

Insert

3/4 6-11

B 3/4 6-2

CONTAINMENT SYSTEMS

DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the supply and exhaust isolation valves in one supply line and one exhaust line open for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With a drywell and/or suppression chamber purge supply and/or exhaust isolation valve open, except as permitted above, close the valve(s) within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.8 At least once per 31 days, verify each primary containment purge valve [18" or 24"] is closed.*, **

-
- * Only required to be met in OPERATIONAL CONDITIONS 1, 2, and 3.
** Not required to be met when the primary containment purge valves are open for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require these valves to be open.

CONTAINMENT SYSTEMS

BASES

3/4.6.1.5 PRIMARY CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the unit. Structural integrity is required to ensure that the containment will withstand the maximum calculated pressure in the event of a LOCA. A visual inspection in accordance with the Primary Containment Leakage Rate Testing Program is sufficient to demonstrate this capability.

3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitations on drywell and suppression chamber internal pressure ensure that the calculated containment peak pressure does not exceed the design pressure of 55 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5.0 psid. The limit of - 1.0 to + 2.0 psig for initial containment pressure will limit the total pressure to \leq 44 psig which is less than the design pressure and is consistent with the safety analysis.

3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during steam line break conditions and is consistent with the safety analysis.

3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open. Limiting the use of the drywell and suppression chamber purge system to specific criteria is imposed to protect the integrity of the SGTS filters. Analysis indicates that should a LOCA occur while this pathway is being utilized, the associated pressure surge through the (18 or 24") purge lines will adversely affect the integrity of SGTS. This condition is not imposed on the 1 and 2 inch valves used for pressure control since a surge through these lines does not threaten the operability of SGTS.

Surveillance requirement 4.6.1.8 ensures that the primary containment purge valves are closed as required or, if open, open for an allowable reason. If a purge valve is open in violation of this SR, the valve is considered inoperable. The SR is modified by a Note stating that primary containment purge valves are only required to be closed in OPERATIONAL CONDITIONS 1, 2 and 3. The SR is also modified by a Note stating that the SR is not required to be met when the purge valves are open for the stated reasons. The Note states that these valves may be opened for inerting, deinerting, pressure control, ALARA or air quality considerations for personnel entry, or Surveillances that require the valves to be open. The 18 or 24 inch purge valves are capable of closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency is consistent with other PCIV requirements.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 130 AND 91 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 March 24, 1997, as supplemented September 4, 1998, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2 Technical Specifications (TSs). The current LGS TS requirements limit the operating time of the drywell and suppression chamber purge system to 180 hours each 365 days during Operational Conditions 1, 2, and 3, i.e. power operation, startup, and hot shutdown, respectively. The proposed changes would delete the above cited operational time limit for the containment purge supply and exhaust valves from TS Section 3.6.1.8 and 4.6.1.8, "Drywell and Suppression Chamber Purge System," and from the TS Bases 3/4.6.1.8, "Drywell and Suppression Chamber Purge System." However, specific criteria for when the containment purge supply and exhaust valves can be opened will be retained and a surveillance requirement will be added to ensure that these valves are closed as required or, if open, opened only for TS identified reasons. The September 4, 1998, letter revises the LGS, Unit 1 and Unit 2 TS pages 3/4 6-11 by removing footnote "*" regarding the 1-inch and 2-inch valves and also revises TS bases page B 3/4 6-2. The September 4, 1998, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

The four criteria defined by 10 CFR 50.36 for determining whether a particular matter is required to be included in the technical specification limiting conditions for operations, are as follows:

- (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;
- (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (4) a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

Existing technical specification requirements which fall within or satisfy any of the above criteria must be retained in the Technical Specifications; those requirements which do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents.

3.0 EVALUATION

At the present time, TS 3.6.1.8 states that, "The drywell and suppression chamber purge system may be in operation for up to 180 hours each 365 days with the supply and exhaust isolation valves in one supply line and one exhaust line open for inerting, deinerting, or pressure control."

The annual limit in operating time of the drywell and suppression chamber purge system during Operating Conditions 1, 2, and 3 was imposed to reduce the probability of, and minimize the consequences of, equipment damage resulting from a loss-of-coolant-accident (LOCA) during the time that the large purge and vent valves are open.

The licensee's submittal of March 24, 1997, as supplemented September 4, 1998, requested that the TS be revised to delete the drywell and suppression chamber purge system operational time limit, and add a surveillance requirement that would verify, at least once every 31 days, that each primary containment purge valve (18" or 24") is closed. The specific criteria for which the purge valves can be open will be retained. The specific criteria for opening the purge valves includes: inerting, de-inerting, pressure control, "as low as reasonably achievable" (ALARA), or air quality concerns for personnel entry or surveillances that require the valves to be open. The request was based on industry operating history which indicates when these purging lines are opened only for the specified reasons (identified during the development of NUREG 1433, "Standard Technical Specifications, General Electric Plants, BWR/4") and that the open hours are significantly less on average than the current General Electric Standard TS allowed cumulative times. A review of the operating history at the LGS indicates the average open hours for the purge system valves over the last five years is 43 hours for LGS, Unit 1 and 29 hours for LGS, Unit 2. The licensee's request is supported by their analysis which demonstrates that the probability of a large early release is still below the staff's safety goal value of $1.0E-6$ per year of reactor operation.

Deletion of the TS operating time limit of these purge valves do not directly or indirectly degrade the performance of any other safety system assumed to function in the design basis accident analysis. Since there are no changes to the design, function or performance of these valves, deleting the TS operating time limit does not meet the four criteria of 10 CFR 50.36 in that there are no changes that would affect:

- (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
- (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (4) a structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

The LGS, Units 1 and 2, Safety Analysis Report (SAR) and the level 2 Probabilistic Safety Assessment (PSA) analysis pertaining to containment failure were previously performed to evaluate the risk associated with the current 180 hour limit. The main parameter considered was the large early release frequency (LERF) which considers the release of radioactive material without the occurrence of public evacuation. The results of that evaluation indicated a 3% increase of the LERF from the Level 2 base value of $2.57E-8$ that considered all PSA initiators. The licensee performed an additional PSA analysis to support the current application which assumed an operating limit of 500 hours as an increase on the same level of magnitude that was previously used and approved by the NRC staff which increased the operating limit from 90 to 180 hours. The 500-hour purge deviation in the latest above cited PSA analysis increased the LERF by approximately 6.6% from the base value of $2.57 E-8$ for all PSA initiators which is below the NRC staff's safety goal value of $1.0E-6$ per year of reactor operation.

The September 4, 1998, letter revises the LGS, Unit 1 and Unit 2 TS pages 3/4 6-11 to remove footnote "" regarding the 1-inch and 2-inch valves and revises the TS bases page B 3/4 6-2. The September 4, 1998, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination. Regarding removal of footnote "" on TS pages 3/4 6-11 for Units 1 and 2, retention of the 1-inch and 2-inch valves footnote has the potential for misinterpretation that pressure control is restricted to the 1-inch and 2-inch valves only, which is not part of the LGS design basis, nor the intent of NUREG-1433.

The NRC staff recognizes the need to provide operational flexibility with regard to the use of the drywell and suppression chamber purge system for the uses specified in LGS's TS 3.6.1.8. The licensee's proposed change regarding operating time provides a reasonable margin to expected operational needs, and the licensee's request is well within the staff's safety goal and is not required to be in the TS by 10 CFR 50.36 as described above. Therefore, the proposed changes, including the added surveillance that verifies at least once every 31 days that each containment purge valve (18" or 24") is closed, and removal of footnote "" are 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 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 (62 FR 30643). 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: October 1, 1998