



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

April 16, 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: CONSENT TO CONFIRMATORY ORDER MODIFYING LICENSE, LIMERICK  
GENERATING STATION (LGS), UNITS 1 AND 2 (TAC NOS. M85565 AND M85566)**

Dear Mr. Edwards:

By letter dated August 2, 1995, you informed us of your schedule commitment for implementing Thermo-Lag 330-1 fire barrier corrective actions at the Limerick Generating Station (LGS), Units 1 and 2. Due to NRC staff concerns that Thermo-Lag corrective actions have not been completed at LGS, Units 1 and 2, to date and to preclude any schedule slippage, we plan to modify the LGS, Units 1 and 2 licenses by order to make this commitment a requirement. If the Philadelphia Electric Company consents, we plan to incorporate the commitment into a Confirmatory Order Modifying License for each unit as follows:

Philadelphia Electric Company shall complete final implementation of Thermo-Lag 330-1 fire barrier corrective actions at LGS, Units 1 and 2, described in the Philadelphia Electric Company's submittals to the NRC dated April 16 and December 29, 1993, February 4 and December 19, 1994, March 29 and August 2, 1995, May 2, 1996, March 24, 1997, and January 14, 1998, by completion of the April 1999 refueling outage for LGS, Unit 2.

By consenting to issuance of the Order confirming the above commitment, Philadelphia Electric Company is waiving its right to request a hearing on all or any part of the Order. Mr. John B. Cotton must sign, as noted on the enclosure to this letter, that he agrees to such a commitment on behalf of Philadelphia Electric Company and return the enclosure within 10 business days from the date of this letter to Mr. Samuel J. Collins, Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738. After receiving written consent, the NRC will issue the aforementioned Order.

Questions concerning this letter should be addressed to the NRC Project Manager, Mr. Bartholomew C. Buckley at (301) 415-1483.

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PDR ADDCK 05000352  
P PDR

READ FILE CENTER COPY

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,

/s/

John A. Zwolinski, Acting Director  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352  
and 50-353

Enclosure: Commitment

cc w/encl: See next page

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*As corrected*

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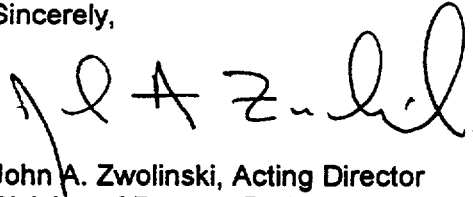
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G. Edwards

- 2 -

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Zwolinski". The signature is written in a cursive style with a large initial "J" and "Z".

John A. Zwolinski, Acting Director  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352  
and 50-353

Enclosure: Commitment

cc w/encl: See next page

Mr. Garrett D. Edwards  
PECO Energy Company

Limerick Generating Station, Units 1 & 2

cc:

J. W. Durham, Sr., Esquire  
Sr. V.P. & General Counsel  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

Chief-Division of Nuclear Safety  
PA Dept. of Environmental Resources  
P.O. Box 8469  
Harrisburg, PA 17105-8469

Manager-Limerick Licensing, 62A-1  
PECO Energy Company  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

Director-Site Engineering  
Limerick Generating Station  
P.O. Box A  
Sanatoga, PA 19464

Mr. James D. von Suskil, Vice President  
Limerick Generating Station  
Post Office Box A  
Sanatoga, PA 19464

Manager-Experience Assessment  
Limerick Generating Station  
P.O. Box A  
Sanatoga, PA 19464

Plant Manager  
Limerick Generating Station  
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Sanatoga, PA 19464

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Senior Manager-Operations  
Limerick Generating Station  
P.O. Box A  
Sanatoga, PA 19464

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
Limerick Generating Station  
P.O. Box 596  
Pottstown, PA 19464

Dr. Judith Johnsrud  
National Energy Committee  
Sierra Club  
433 Orlando Avenue  
State College, PA 16803

Director-Site Support Services  
Limerick Generating Station  
P.O. Box A  
Sanatoga, PA 19464

Chairman  
Board of Supervisors  
of Limerick Township  
646 West Ridge Pike  
Linfield, PA 19468

I, John B. Cotton, Vice President-Station Support, Philadelphia Electric Company, Limerick Generating Station, Units 1 and 2, hereby agree on behalf of Philadelphia Electric Company that Philadelphia Electric Company will comply with the following commitment:

Philadelphia Electric Company shall complete final implementation of Thermo-Lag 330-1 fire barrier corrective actions at LGS, Units 1 and 2, described in the Philadelphia Electric Company's submittals to the NRC dated April 16 and December 29, 1993, February 4 and December 19, 1994, March 29 and August 2, 1995, May 2, 1996, March 24, 1997, and January 14, 1998, by completion of the April 1999 refueling outage for LGS, Unit 2.

Philadelphia Electric Company also agrees to incorporating this commitment into a Confirmatory Order Modifying License (Order) that will be effective immediately upon issuance. I recognize that by signing below, Philadelphia Electric Company consents to the issuance of an immediately effective Order incorporating the above commitment and, by doing so, pursuant to 10 CFR 2.202(a)(3), Philadelphia Electric Company will not have a right to request a hearing on all or any part of this Order.

\_\_\_\_\_  
John B. Cotton, Vice President-Station Support  
Philadelphia Electric Company

\_\_\_\_\_  
Date

ENCLOSURE