

February 8, 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: LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M93210 AND M93211)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 110 to Facility Operating License No. NPF-39 and Amendment No. 73 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 July 28, 1995.

These amendments eliminate the requirement to perform 10 CFR Part 50, Appendix J, Type C hydrostatic tests on certain valves that are assured a water seal following a Design Basis Accident (DBA).

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 Nos. 50-352/353

- Enclosures:
1. Amendment No. 110 to License No. NPF-39
  2. Amendment No. 73 to License No. NPF-85
  3. Safety Evaluation

cc w/encls: See next page

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DATE	12/21/95	12/21/95	12/21/95	1/23/95 AW	1/95	2/7/96	2/7/96

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 8, 1996

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 62A-1  
PECO Energy Company  
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P.O. Box No. 195  
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SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M93210 AND M93211)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 110 to Facility Operating License No. NPF-39 and Amendment No. 73 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 July 28, 1995.

These amendments eliminate the requirement to perform 10 CFR Part 50, Appendix J, Type C hydrostatic tests on certain valves that are assured a water seal following a Design Basis Accident (DBA).

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 Nos. 50-352/353

Enclosures: 1. Amendment No. 110 to  
License No. NPF-39  
2. Amendment No. 73 to  
License No. NPF-85  
3. Safety Evaluation

cc w/encls: See next page

Mr. George A. Hunger, Jr.  
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, Pennsylvania 19101

Mr. Rich R. Janati, Chief  
Division of Nuclear Safety  
PA Dept. of Environmental Resources  
P. O. Box 8469  
Harrisburg, Pennsylvania 17105-8469

Mr. David P. Helker, MC 62A-1  
Manager-Limerick Licensing  
PECO Energy Company  
965 Chesterbrook Boulevard  
Wayne, Pennsylvania 19087-5691

Mr. Michael P. Gallagher  
Director - Site Engineering  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Walter G. McFarland, Vice President  
Limerick Generating Station  
Post Office Box A  
Sanatoga, Pennsylvania 19464

Mr. James L. Kantner  
Manager-Experience Assessment  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Robert Boyce  
Plant Manager  
Limerick Generating Station  
P.O. Box A  
Sanatoga, Pennsylvania 19464

Library  
US Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Ludwig E. Thibault  
Senior Manager - Operations  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Neil S. Perry  
Senior Resident Inspector  
US Nuclear Regulatory Commission  
P. O. Box 596  
Pottstown, Pennsylvania 19464

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

Mr. Craig L. Adams  
Director - Site Support Services  
Limerick Generating Station  
P.O. Box A  
Sanatoga, Pennsylvania 19464

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



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. 110  
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 July 28, 1995, 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. 110 , 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, to 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: February 8, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 110

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 6-26

3/4 6-27

3/4 6-29

-

Insert

3/4 6-26

3/4 6-27

3/4 6-29

3/4 6-43a

TABLE 3.6.3-1 (Continued)  
PART A - PRIMARY CONTAINMENT ISOLATION VALVES

PENETRATION FUNCTION NUMBER		INBOARD ISOLATION BARRIER	OUTBOARD ISOLATION BARRIER	MAX. ISOL. TIME. IF APP. (SEC) (26)	ISOL. SIGNAL(S), IF APP. (20)	NOTES	P&ID
			SV57-191 (X-220A)	5	B,H,R,S	11	
116	STANDBY LIQUID CONTROL	48-1F007(CK) (X-42)		NA			48
			HV48-1F006B	60		29	
117B-1	DRYWELL RADIATION MONITORING SUPPLY	SV26-190A		5	B,H,R,S	11	26
			SV26-190B	5	B,H,R,S	11	
117B-2	DRYWELL RADIATION MONITORING RETURN	SV26-190C		5	B,H,R,S	11	26
			SV26-190D	5	B,H,R,S	11	
201A	SUPPRESSION POOL PURGE SUPPLY	HV57-124 HV57-131(X-25)		5** 5**	B,H,S,U,W,R,T B,H,S,U,W,R,T	3,11,14 3,11,14	57
			HV57-109(X-25)	6**	B,H,S,U,W,R,T	11	
			HV57-147	6**	B,H,S,U,W,R,T	11	
			HV57-121(X-25)	5**	B,H,S,U,W,R,T	11	
	HYDROGEN RECOMBINER "B" EXHAUST	HV57-164		9	B,H,R,S	3,11,14	
			HV57-169	9	B,H,R,S	11	
202	SUPPRESSION POOL PURGE EXHAUST	HV57-104 HV57-105		5** 15**	B,H,S,U,W,R,T B,H,S,U,R,T	3,11,14,33 11	57
			HV57-112	6**	B,H,S,U,W,R,T	11,33	
			HV57-118	5**	B,H,S,U,R,T	11	
			SV57-185	5	B,H,R,S	11	
	HYDROGEN RECOMBINER "A" EXHAUST	HV57-162		9	B,H,R,S	3,11,14	
			HV57-166	9	B,H,R,S	11	
203A(B,C,D)	RHR PUMP SUCTION		HV51-1F004A(B,C,D)	240		29,35	51
			PSV51-1F030A (B,C,D)	NA		35	

LIMERICK - UNIT 1

3/4 6-26

Amendment No. 6, 13, 15, 33, 110

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

<u>PENETRATION NUMBER</u>	<u>FUNCTION</u>	<u>INBOARD ISOLATION BARRIER</u>	<u>OUTBOARD ISOLATION BARRIER</u>	<u>MAX. ISOL. TIME. IF APP. (SEC) (26)</u>	<u>ISOL. SIGNAL(S), IF APP. (20)</u>	<u>NOTES</u>	<u>P&amp;ID</u>
204A(B)	RHR PUMP TEST LINE AND CONTAINMENT COOLING		HV51-125A(B)	180		29,35	51
205A(B)	SUPPRESSION POOL SPRAY		HV51-1F027A(B)	45	C,G	11	51
206A(B,C,D)	CS PUMP SUCTION		HV52-1F001A (B,C,D)	160		29,35	52
207A(B)	CS PUMP TEST AND FLUSH		HV52-1F015A(B)	23	C,G	35	52
208B	CS PUMP MINIMUM RECIRC		HV52-1F031B	45	LFCH	29,35	52
209	HPCI PUMP SUCTION		HV55-1F042	160	L,LA	35	55
210	HPCI TURBINE EXHAUST		HV55-1F072	120		29,35	55
212	HPCI PUMP TEST AND FLUSH		HV55-1F071	40	B,H	35	55
214	RCIC PUMP SUCTION		HV49-1F031	60		29,35	49
215	RCIC TURBINE EXHAUST		HV49-1F060	80		29,35	49
216	RCIC MINIMUM FLOW		HV49-1F019	8	LFRC	35	49

LIMERICK - UNIT 1

3/4 6-27

Amendment No. 2, 3, 110

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		HV51-105A	40		29,35	51
226B	RHR MINIMUM RECIRC		HV51-105B	40		29,35	51
227	ILRT DATA ACQUISITION SYSTEM	60-1073	60-1074	NA NA			60
228D	HPCI VACUUM RELIEF	HV55-1F095	HV55-1F093	40 40	H, LA H, LA	4, 11, 24 11, 24	55
230B	INSTRUMENTATION - DRYWELL SUMP LEVEL		HV61-102 HV61-112 HV61-132	45 45 45		1, 23, 29 23, 29 23, 29	61
231A	DRYWELL FLOOR DRAIN SUMP DISCHARGE	HV61-110	HV61-111	30 30	B, H B, H	11, 22 11, 22	61
231B	DRYWELL EQUIPMENT DRAIN TANK DISCHARGE	HV61-130	HV61-131	30 30	B, H B, H	11, 22 11, 22	61
235	CS PUMP MINIMUM RECIRC		HV52-1F031A	45	LFCH	29, 35	52
236	HPCI PUMP MINIMUM RECIRC		HV55-1F012	15	LFHP	35	55

LIMERICK - UNIT 1

3/4 6-29

Amendment No. 18, 33, 88, 110

TABLE 3.6.3-1  
PRIMARY CONTAINMENT ISOLATION VALVES  
NOTATION

NOTES (Continued)

35. These valves are in lines that are below the minimum water level in the suppression pool, are part of closed systems outside primary containment, and are in portions of lines which a water seal will be present following an accident. Therefore, 10CFR50, Appendix J, Type C testing is not required.



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. 73  
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 July 28, 1995, 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. 73 , 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, to 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: February 8, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 73

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 6-26

3/4 6-27

3/4 6-29

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Insert

3/4 6-26

3/4 6-27

3/4 6-29

3/4 6-43a

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
			SV57-291 (X-220A)	5	B,H,R,S	11	
116	STANDBY LIQUID CONTROL	48-2F007(CK) (X-42)	HV48-2F006B	NA 60		29	48
117B-1	DRYWELL RADIATION MONITORING SUPPLY	SV26-290A	SV26-290B	5 5	B,H,R,S B,H,R,S	11 11	26
117B-2	DRYWELL RADIATION MONITORING RETURN	SV26-290C	SV26-290D	5 5	B,H,R,S B,H,R,S	11 11	26
201A	SUPPRESSION POOL PURGE SUPPLY	HV57-224 HV57-231(X-25)	HV57-209(X-25) HV57-247 HV57-221(X-25)	5** 5** 6** 6** 5**	B,H,S,U,W,R,T B,H,S,U,W,R,T B,H,S,U,W,R,T B,H,S,U,W,R,T B,H,S,U,W,R,T	3,11,14 3,11,14 11 11 11	57
	HYDROGEN RECOMBINER "B" EXHAUST	HV57-264	HV57-269	9 9	B,H,R,S B,H,R,S	3,11,14 11	
202	SUPPRESSION POOL PURGE EXHAUST	HV57-204 HV57-205	HV57-212 HV57-218 SV57-285	5** 15** 6** 5** 5	B,H,S,U,W,R,T B,H,S,U,R,T B,H,S,U,W,R,T B,H,S,U,R,T B,H,R,S	3,11,14,33 11 11,33 11 11	57
	HYDROGEN RECOMBINER "A" EXHAUST	HV57-262	HV57-266	9 9	B,H,R,S B,H,R,S	3,11,14 11	
203A(B,C,D)	RHR PUMP SUCTION		HV51-2F004A (B,C,D)	240		29,36	51
			PSV51-2F030A (B,C,D)	NA		36	

LIMERICK - UNIT 2

3/4 6-26

Amendment No. 73

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

<u>PENETRATION NUMBER</u>	<u>FUNCTION</u>	<u>INBOARD ISOLATION BARRIER</u>	<u>OUTBOARD ISOLATION BARRIER</u>	<u>MAX. ISOL. TIME. IF APP. (SEC) (26)</u>	<u>ISOL. SIGNAL(S), IF APP. (20)</u>	<u>NOTES</u>	<u>P&amp;ID</u>
204A(B)	RHR PUMP TEST LINE AND CONTAINMENT COOLING		HV51-225A(B)	180		29,36	51
205A(B)	SUPPRESSION POOL SPRAY		HV51-2F027A(B)	45	C,G	11	51
206A(B,C,D)	CS PUMP SUCTION		HV52-2F001A (B,C,D)	160		29,36	52
207A(B)	CS PUMP TEST AND FLUSH		HV52-2F015A(B)	23	C,G	36	52
208B	CS PUMP MINIMUM RECIRC		HV52-2F031B	45	LFCH	29,36	52
209	HPCI PUMP SUCTION		HV55-2F042	160	L,LA	36	55
210	HPCI TURBINE EXHAUST		HV55-2F072	120		29,36	55
212	HPCI PUMP TEST AND FLUSH		HV55-2F071	40	B,H	36	55
214	RCIC PUMP SUCTION		HV49-2F031	60		29,36	49
215	RCIC TURBINE EXHAUST		HV49-2F060	80		29,36	49
216	RCIC MINIMUM FLOW		HV49-2F019	8	LFRC	36	49

LIMERICK - UNIT 2

3/4 6-27

Amendment No. 73

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

<u>PENETRATION NUMBER</u>	<u>FUNCTION</u>	<u>INBOARD ISOLATION BARRIER</u>	<u>OUTBOARD ISOLATION BARRIER</u>	<u>MAX. ISOL. TIME. IF APP. (SEC) (26)</u>	<u>ISOL. SIGNAL(S), IF APP. (20)</u>	<u>NOTES</u>	<u>P&amp;ID</u>
226A	RHR MINIMUM RECIRC		HV51-205A	40		29,36	51
226B	RHR MINIMUM RECIRC		HV51-205B	40		29,36	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	29,36	52
236	HPCI PUMP MINIMUM RECIRC		HV55-2F012	15	LFHP	36	55

LIMERICK - UNIT 2

3/4 6-29

Amendment No. 47, 73

TABLE 3.6.3-1  
PRIMARY CONTAINMENT ISOLATION VALVES  
NOTATION

NOTES (Continued)

36. These valves are in lines that are below the minimum water level in the suppression pool, are part of closed systems outside primary containment, and are in portions of lines which a water seal will be present following an accident. Therefore, 10CFR50, Appendix J, Type C testing is not required.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 110 AND 73 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 July 28, 1995, the Philadelphia Electric Company (PECO or the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS). The requested changes would eliminate the TS requirement to perform 10 CFR Part 50, Appendix J, Type C leakage rate tests on certain valves that are assured a water seal following a Design Basis Accident (DBA). These valves are in portions of the High Pressure Coolant Injection (HPCI), Reactor Core Isolation Cooling (RCIC), Core Spray (CS), and Residual Heat Removal (RHR) system containment isolation valves (CIVs) that serve lines below the suppression pool and penetrate below the minimum water level in the suppression pool. Twenty-seven valves of this type per unit are noted as requiring leakage rate testing in TS Table 3.6.3-1, "Primary Containment Isolation Valves." These valves are located within closed systems outside the primary containment and remain below the minimum suppression pool water level following a DBA. These valves are presently subject to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Section XI Code, Category A leakage testing requirements, although the licensee has indicated its intent to change this classification under 10 CFR 50.59. The 10 CFR Part 50, Appendix J, Type C leakage rate is not required nor necessary to ensure that the post DBA radiological releases from the primary containment are within allowable limits.

2.0 BACKGROUND

The Code of Federal Regulations, 10 CFR Part 50, Appendix J, establishes the requirements for containment leakage rate tests for all operating licenses for water-cooled power reactors. Three tests are specified in Option A of the regulation: Type A (integrated leakage), Type B (penetration local leakage), and Type C (containment isolation valve (CIV) local leakage). A CIV is defined in Appendix J, Option A as "any valve which is relied upon to perform a containment isolation function." Containment is defined as "...an essentially leak-tight barrier against the uncontrolled release of radioactivity to the environment." Therefore, for the purposes of Appendix J leakage rate testing, an Appendix J CIV is a valve which could represent a potential fission product release pathway to the environment following a postulated accident and, consequently, its allowable leakage must be maintained within allowable limits.

### 3.0 EVALUATION

The licensee has proposed to delete the TS requirement to perform a 10 CFR Part 50, Appendix J, Option A, Type C leakage rate test for 27 valves of the HPCI, RCIC, CS, and RHR systems that are assured a water seal following a DBA. Specifically, PECO has proposed to delete notation numbers 4, 5, 19, and 22 for the identified valves in TS Table 3.6.3-1, Part A, and add a new notation to TS Table 3.6.3-1 (Notation 35 for LGS, Unit 1 and Notation 36 for LGS, Unit 2) as follows:

"These valves are in lines that are below the minimum water level in the suppression pool, are part of closed systems outside primary containment, and are in portions of lines which a water seal will be present following an accident. Therefore, 10 CFR 50, Appendix J, Type C testing is not required."

Further, PECO proposes to retain TS Bases 3.6.3, TS Limiting Condition for Operation Section 3.6.1.2.d, requiring leakage rate testing, TS Surveillance Requirement (SR) 4.6.1.2.d.3, noting approval of exemptions permitting leakage rate testing, and TS SR 4.6.1.2.g, required frequency for leakage rate testing since there are valves other than those that are the subject of this proposal, that will continue to require leakage rate testing.

The staff's safety evaluation report (SER) for LGS (NUREG-0991), dated August 1983, considered the licensee's containment leakage testing program in Section 6.2.6. The staff's review included the licensee's proposal to hydrostatic test isolation valves in several systems that penetrated containment, including the HPCI, RCIC, CS, and RHR systems, rather than testing with air or nitrogen. The SER noted these liquid filled systems "are specifically designed to remain intact after a LOCA and thus provide a water seal for the system isolation valves or ensure that only liquid leakage from the containment will occur." The SER in Section 6.2.6.4 states: "The combined leakage from all these valves will satisfy the acceptance criteria of 10 CFR 100 regarding the site radiological safety analysis and will be included in the plant Technical Specifications. This leakage will therefore be excluded when the combined leakage rate for all penetrations and valves is determined, as provided for in Appendix J, Paragraph III.C.3." Thus, the SER concluded that the valves need not be tested with air or nitrogen and that the liquid leakage from the valves need not be included in the combined leakage rate for all containment penetrations and isolation valves. The SER, however, did not consider whether or not the valves actually performed a containment isolation function for potential primary containment atmospheric pathways to the environment. This evaluation considers that issue.

The piping associated with the subject valves penetrates the suppression pool and terminates below the minimum water level of the suppression pool. The suppression pool water level is assured under post-accident conditions (LGS Updated Final Safety Analysis Report (UFSAR) Section 6.2.3.2.3.1), whereby these valves will remain sealed with water 30 days following the postulated accident. The suppression pool level is designed and operated so that water

level is maintained in accordance with TS 3/4.5.3, "Suppression Chamber," 3/4.6.2, "Depressurization Systems - Suppression Chamber," and the associated TS Bases. Further, LGS calculation MISC-62 determined that the lowest water level that the suppression pool will experience after a DBA is at least 4 feet above the affected penetrations. The supply of water in the suppression pool is assured for 30 days during all DBA, post-accident modes of operation.

The licensee has stated that the affected valves may be open post-accident to support the design function of their associated Emergency Core Cooling System (ECCS). Therefore, containment leakage is limited by the suppression pool water seal and the integrity of the closed system outside containment. LGS TS Section 6.8.4.a, "Primary Coolant Sources Outside Containment," establishes a program to monitor and control leakage from systems located outside containment that could contain radioactive fluids during a serious transient or accident. This program applies to the ECCS affected by these proposed changes, and ensures that leakage into secondary containment (e.g., packing, flanges, seals) is controlled. Leakages from these systems previously have been found to be well below the established limit. The proposed change will not contribute to higher levels of system leakage and any leakage from these systems will be processed via standby gas treatment and the radwaste systems.

For these reasons, the staff finds that the suppression pool will remain filled with water at a level above the penetrations for the system discussed. Further, the staff finds that the isolated valves associated with these systems do not constitute potential containment atmosphere leak paths following a postulated accident.

The affected penetrations will continue to be subjected to the periodic 10 CFR Part 50, Appendix J, Option A, Type A testing (integrated Containment Leakage Rate Test). Paragraph III.A.1 of 10 CFR Part 50, Appendix J, Option A, lists the pretest requirements for conducting the Type A test. In particular, Paragraph III.A.1.(d) describes certain systems that are required to be in a specified condition for the test (i.e., vented, drained, filled with water, operating) and further requires that the isolation valves in the systems defined in the paragraph shall be Type C tested. The staff finds that the isolation valves for the systems in the licensee's proposed change request do not constitute potential containment atmosphere leakage paths and, as such, are not within those defined in paragraph III.A.1.(d) as requiring Type C testing. For these same reasons, the staff finds that the valves under consideration in the proposed change are not within the paragraph II.H description of containment isolation valves meant to be included in the Type C leakage rate testing.

These findings are consistent with the Nuclear Energy Institute (NEI) guidelines for implementing Option B of 10 CFR Part 50, Appendix J. NEI 94-01, which is approved by Regulatory Guide 1.163, September 1995, as acceptable for complying with Option B of Appendix J states on Page 4 that a Type C leakage rate test is not required for, among other things, "Primary Containment Boundaries that do not constitute potential primary containment atmospheric pathways during and following a Design Basis Accident (DBA)." The

findings are also consistent with the American Nuclear Standards Institute/American Nuclear Society (ANSI/ANS) 56-8-1994, Section 3.3.1, which states that "Primary containment boundaries not requiring Type B or Type C testing include: (1) boundaries that do not constitute potential primary containment atmospheric pathways during and following a DBA."

The licensee will continue to test the affected valves per the applicable inservice testing (IST) requirements in accordance with ASME Section XI, under the LGS IST Program. The licensee has stated an intent to reclassify the CIVs from ASME Section XI, Category A valves to Category B valves under 10 CFR 50.59. Category B valves are those for which seat leakage in the closed position is inconsequential for fulfillment of its required function(s).

Based on the above evaluation, the staff concludes that the proposed changes to TS Table 3.6.3-1, "Primary Containment Isolation Valves," to eliminate 10 CFR 50, Appendix J, Type C leakage rate testing of the twenty-seven CIVs in each unit are acceptable and that the containment systems for LGS continue to meet applicable requirements.

#### 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. 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 (60 FR 49941). 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: J. Pulsipher  
R. Lobel

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