



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

November 5, 1992

Docket Nos. 50-352  
and 50-353

Posted  
Amdt. 23 to NPF-85

Mr. George J. Beck  
Manager-Licensing, MC 52A-5  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: CLARIFICATION OF RESIDUAL HEAT REMOVAL SYSTEM SURVEILLANCE  
REQUIREMENTS, LIMERICK GENERATING STATION, UNITS 1 AND 2  
(TSCR 92-09-0) (TAC NOS. M84308 AND M84309)

The Commission has issued the enclosed Amendment No. 57 to Facility Operating License No. NPF-39 and Amendment No. 23 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 August 11, 1992.

These amendments change surveillance requirement (SR) 4.6.2.3.b and the associated Bases of the TSs to clarify that the intent of this specific SR is to confirm Residual Heat Removal (RHR) pump performance in the Suppression Pool Cooling (SPC) mode of operation. The TS change revises the SR to include the RHR heat exchanger bypass valve as well as the shell side of the RHR heat exchanger in the overall flow path. On October 1, 1992, during the quarterly test of the Unit 2 "B" RHR pump, you determined that leakage through the bypass butterfly valve around the 2B RHR heat exchanger had increased since the previous quarterly test on June 25, 1992, such that the measured flow through the heat exchanger was less than 10,000 gpm. On October 1, 1992, at your request, we granted a verbal temporary waiver of compliance from SR 4.6.2.3.b for Unit 2. This was confirmed by our letter of October 5, 1992, and was in response to your letters of October 2 and 5, 1992. This temporary waiver of compliance expires with the issuance of these amendments.

While we agree with your position that SR 4.6.2.3.b was intended to be an Inservice Test (IST) of the RHR pumps, as discussed in the enclosed safety evaluation, we requested that you submit the subject TS application to focus your attention on the high percentage of RHR pump flow that could be bypassing the RHR heat exchanger and thus could reduce the heat transfer capability of the heat exchanger. The request for the TS application was also prompted by our perception that increased attention should be given to performance of not only the valves in the RHR system but to the performance of valves in the RHR

Mr. George J. Beck

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November 5, 1992

Service Water (RHRSW) and Emergency Service Water (ESW) systems, the fouling, pitting and corrosion of the RHR heat exchanger tubes, the corrosion and leaks in the service water systems, the need to utilize freeze-seals to work on components and piping, and the issues being evaluated by your Raw Water Task Force.

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

Sincerely,

Original signed by  
Richard J. Clark

Richard J. Clark, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosures: *See 50-352*

1. Amendment No. 57 to License No. NPF-39  
Amendment No. 23 to License No. NPF-85
2. Safety Evaluation

cc w/enclosures:  
See next page

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Mr. George J. Beck

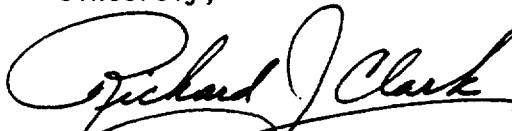
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Richard J. Clark, Senior Project Manager  
Project Directorate I-2  
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Mr. George J. Beck  
Philadelphia Electric Company

Limerick Generating Station,  
Units 1 & 2

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