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T.S. 3.3.7.10 T.S. 6.9.2

June 7, 2001 | Docket No. 50-353 License No. NPF-85

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

SUBJECT: Limerick Generating Station, Unit 2 Special Report for the Inoperability of a Loose-Part Detection System Channel for More Than 30 Days, Revision 2

This Special Report is being submitted pursuant to the requirements of Limerick Generating Station (LGS), Unit 2 Technical Specifications (TS) Section 6.9.2 as required by TS Section 3.3.7.10, "Loose-Part Detection System." TS Section 3.3.7.10 requires that with one or more of the required Loose-Part Detection System (LPDS) channels inoperable for more than 30 days, a Special Report must be prepared and submitted within 10 days outlining the cause of the malfunction and the plans for restoring the channel(s) to operable status. The LPDS is required to be operable in Operational Condition (OPCON) 1 (Power Operation) and OPCON 2 (Start-up).

On November 3, 1999, with Unit 2 operating at 100% power, during performance of procedure ST-6-107-590-2, "Daily Surveillance Logs/OPCONS 1, 2, 3," LPDS channel #2 was identified as reading high with no alarm condition or audible noise present (indicating no actual loose parts event).

During performance of troubleshooting activities, a noise signal on channel two was identified. The noise is attributed to an intermittent ground connection of the hardline cable or hardline cable shield. The hardline cable is located in the drywell.

The Unit 2 LPDS system was declared inoperable per station Technical Specification 3.3.7.10 due to failure to meet surveillance requirement 4.3.7.10. On December 8, 1999, a Special Report was submitted as required by Technical Specification 3.3.7.10 action 'a'.

IEDA

On March 25, 2001, Channel #4 was discovered to be reading above the high alarm setpoint and the high alarm was not annunciated. Channel #4 was determined to be inoperable.

On April 18, 2001, Special Report Revision 1 was submitted to reflect a Technical Specification Change Request that was in process to abandon the system. This revision also stated that the inoperable channels would not be repaired during the sixth refueling outage as previously stated in Revision 0.

On April 19, 2001, Unit 2 was restarted following refueling. This resulted in Technical Specification 3.3.7.10 action 'a' becoming applicable once again due to the inoperable status of channels 2 and 4.

On April 23, 2001, a Technical Specification Change Request was submitted to remove the requirement for this system. This Technical Specifications Change Request will delete the Loose-Part Detection System and the associated Technical Specifications and Bases currently contained in the LGS, Units 1 and 2 Technical Specifications.

The inoperable LPDS has no impact on plant operation.

If you have any questions or require additional information, please contact Ms. Kay Gallogly at (610) 718-3400.

Very truly yours,

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Robert C. Braun, Plant Manager

cc: H. J. Miller, Administrator Region I, USNRC A. L. Burritt, USNRC Senior Resident Inspector, LGS