

Exelon Nuclear  
200 Exelon Way  
KSA 3-E  
Kennett Square, PA 19348

Telephone 610.765.5520  
www.exeloncorp.com

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Docket Nos: 50-352  
50-353

License Nos: NPF-39  
NPF-85

U. S. Nuclear Regulatory Commission  
Attn: Document Control desk  
Washington, D.C. 20555-0001

Subject: Limerick Generating Station, Units 1 & 2  
Revised Technical Specifications Bases 3/4.9.11

Dear Sir/Madam:

Exelon Generation Company, LLC recently revised the Technical Specifications (TS) Bases for Limerick Generating Station (LGS), Units 1 and 2, in accordance with 10CFR50.59. TS Bases Section 3/4.9.11 has been revised to reflect previously approved LGS TS Amendments 87 and 49, for LGS Units 1 and 2, respectively. These amendments removed the operability requirements for the Standby Liquid Control (SLC) System in Operational Condition 5 from TS 3/4.1.5. The amendments were issued January 27, 1995.

Attached are the revised TS Bases Pages B3/4 9-2a for LGS Units 1 and 2, for your information.

If you have any questions, please do not hesitate to contact us.

Very truly yours,



James A. Hutton, Jr.  
Director- Licensing  
Mid-Atlantic Regional Operating Group

Attachments

cc: H. J. Miller, USNRC Administrator, Region 1 (w/enc)  
A. L. Burritt, USNRC Senior Resident Inspector, LGS (w/enc)

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### 3/4.9.11 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION (Cont'd)

having one (1) RHR shutdown cooling subsystem OPERABLE ensures that 1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor pressure vessel below 140°F, and 2) sufficient coolant circulation would be available through the reactor core to assure accurate temperature indication.

The requirement to have two (2) RHR shutdown cooling subsystems OPERABLE when there is less than 22 feet of water above the reactor vessel flange ensures that a single failure of the operating loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and 22 feet of water above the reactor vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR subsystem, adequate time is provided to initiate alternate methods capable of decay heat removal or emergency procedures to cool the core.

To meet the LCO of the two (2) subsystems OPERABLE when there is less than 22 feet of water above the reactor vessel flange, both pumps in one (1) loop or one (1) pump in each of the two (2) loops must be OPERABLE. The two (2) subsystems have a common suction source and are allowed to have a common heat exchanger and common discharge piping. Additionally, each shutdown cooling subsystem can provide the required decay heat removal capability; however, ensuring operability of the other shutdown cooling subsystem provides redundancy.

The required cooling capacity of an alternate method of decay heat removal should be ensured by verifying its capability to maintain or reduce reactor coolant temperature either by calculation (which includes a review of component and system availability to verify that an alternate decay heat removal method is available) or by demonstration. Decay heat removal capability by ambient losses can be considered in evaluating alternate decay heat removal capability.

With the required decay heat removal subsystem(s) inoperable and the required alternate method(s) of decay heat removal not available in accordance with Action "a", additional actions are required to minimize any potential fission product release to the environment. This includes ensuring Refueling Floor Secondary Containment is OPERABLE; one (1) Standby Gas Treatment subsystem is OPERABLE; and Secondary Containment isolation capability (i.e., one (1) Secondary Containment isolation valve and associated instrumentation are OPERABLE or other acceptable administrative controls to assure isolation capability) in each associated penetration not isolated that is assumed to be isolated to mitigate radioactive releases. This may be performed as an administrative check, by examining logs or other information to determine whether the components are out of service for maintenance or other reasons. It is not necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it must be restored to OPERABLE status. In this case, the surveillance may need to be performed to restore the component to OPERABLE status. Actions must continue until all required components are OPERABLE.

If no RHR subsystem is in operation, an alternate method of coolant circulation is required to be established within one (1) hour. The Completion Time is modified such that one (1) hour is applicable separately for each occurrence involving a loss of coolant circulation.

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