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10CFR50.73

July 20, 2001

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Retraction of LER 2-01-002 Loss of ATWS Flow Split Feature

Limerick Generating Station, Unit 2
Facility Operating License No. NPF-85
NRC Docket No. 50-353

Licensee Event Report (LER) 2-01-002 is being retracted. The LER addressed the failure of a relay which prevented the opening of a discharge valve in the Unit 2 High Pressure Coolant Injection (HPCI) flow path through the feedwater system, and its effect upon the plant's response to postulated anticipated transients without scram (ATWS) events. This relay failure was discovered as part of surveillance testing conducted during refueling outage 2R06.

Upon further review it has been determined that this failure did not result in a condition that could have prevented fulfillment of the safety function of structures or systems that are needed to mitigate the consequences of an accident. The capability to mitigate an ATWS was maintained. The capability to secure HPCI during an ATWS event, as directed by EOP procedures, was not affected by this failure.

10CFR50.62 "Requirements for Reduction of Risk from Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants", requires that the Alternate Rod Injection (ARI), Standby Liquid Control with automatic initiation and reactor coolant recirculating pumps trip systems be included in the plant design for boiling water reactors (BWR). The 10CFR50.62 ATWS risk reduction systems were not affected by this event.

In addition, the ATWS Flow Split feature is not included in plant Technical Specifications nor is it single failure proof. NUREG 1022 rev.2, section 3.2.7 defines the scope of systems covered by reporting criteria 10CFR50.73(a)(2)(v) to be limited to systems required by the TS to be operable to perform one of the four functions (A) through (D) specified in the rule. Also, Example 3 in the same section specifies that if a system is not covered by Technical Specifications and is not single failure proof then failures would not be reportable. Therefore, NUREG 1022 Rev.2 directs that this event is not reportable under 10CFR50.73(a)(2)(v).

IE 22.

Report Number: 2-01-002
Revision: 00
Event Date: April 17, 2001
Discovered Date: April 17, 2001
Report Date: June 18, 2001
Retraction Date: July 20, 2001
Facility: Limerick Generating Station
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Very truly yours,

L.P. O'Malley for R. Braun

Robert C. Braun
Plant Manager

cc: H. J. Miller, Administrator Region I, USNRC
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