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September 20, 2001

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

Peach Bottom Atomic Power Station, Units 2 and 3  
Facility Operating License Nos. DPR-44 and DPR-56  
NRC Docket Nos. 50-277 and 50-278

Limerick Generating Station, Units 1 and 2  
Facility Operation License Nos. NFP-39 and NFP-85  
NRC Docket Nos. 50-352 and 50-353

Subject: Notification of Delay in Activation of Oscillation Power Range  
Monitor Trip Functions

- References:
- (1) Letter, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission "Application for License Amendment involving Activation of Oscillation Power Range Monitor Trips – Peach Bottom Atomic Power Station, Units 2 and 3" dated February 8, 2001
  - (2) Letter, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission "Application for License Amendment involving Activation of Oscillation Power Range Monitor Trips – Limerick Generating Station, Units 1 and 2" dated June 13, 2001
  - (3) Letter, PECO Energy Company to U.S. Nuclear Regulatory Commission "Application for License Amendment involving Installation of the new Power Range Neutron Monitoring System – Peach Bottom Atomic Power Station, Units 2 and 3" dated March 1, 1999
  - (4) Letter, PECO Energy Company to U.S. Nuclear Regulatory Commission "Application for License Amendment involving Installation of the new Power Range Neutron Monitoring System – Limerick Generating Station, Units 1 and 2" dated October 14, 1999

Dear Sir/Madam:

In the Reference 1 and 2 letters, Exelon Generation Company, LLC, requested NRC approval of License Amendments for Peach Bottom Atomic Power Station, Units 2 and 3, and Limerick Generating Station, Units 1 and 2, respectively, involving activation of the Oscillation Power Range Monitor (OPRM) trip functions. Subsequently, on June 29, 2001, General Electric

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Company issued a 10 CFR Part 21 notification identifying potential non-conservative assumptions used in generation of OPRM trip setpoints. As a result, Exelon Generation Company, LLC, has decided to delay activation of the OPRM trip functions at Peach Bottom Units 2 and 3 and at Limerick Units 1 and 2, until more details are known about the Part 21 issue. Thus, we do not need the OPRM trips TS amendment to be issued by August 15, 2001, at Peach Bottom Units 2 and 3 as indicated in the Reference 1 letter, nor do we need the OPRM trips TS amendment to be issued by November 30, 2001, at Limerick Units 1 and 2 as indicated in the Reference 2 letter.

The Reference 3 and 4 letters provide the Peach Bottom and Limerick commitments, respectively, to delay activation of the OPRM trip functions for one cycle following installation of the new Power Range Neutron Monitoring System on each unit in order to perform on-line testing, tuning, and data collection of the instability detect and suppress function. As described above, it is necessary to revise these commitments since it will not be possible to activate the OPRM trip functions until more information is obtained from General Electric regarding this Part 21 issue.

We request that the NRC hold issuance of the Amendments requested in References 1 and 2. Exelon will continue to work with the NRC to determine the best course of action to be taken to ensure proper activation of the OPRM trip functions.

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

Sincerely,



Michael P. Gallagher  
Director - Licensing

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