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10 CFR 50.55a

April 12, 2002

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

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

Subject: Proposed Alternative Associated with the Second Ten-Year Interval Inservice Testing (IST) Program

Reference: Letter from J. W. Clifford (U. S. Nuclear Regulatory Commission) to J. A. Hutton (PECO Energy Company), dated November 28, 2000

Dear Sir/Madam:

In the Referenced letter, the U. S. Nuclear Regulatory Commission provided approval of alternatives and relief requests associated with the second ten-year interval inservice testing (IST) program for Limerick Generating Station (LGS), Units 1 and 2. Attached for your review and approval is a proposed alternative for LGS, Units 1 and 2. Your approval is requested by April 15, 2003.

If you have any questions, please contact us.

Very truly yours,

D. G. Wells for

Michael P. Gallagher
Director – Licensing & Regulatory Affairs
Mid-Atlantic Regional Operating Group

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

A047

RELIEF REQUEST NO. GVRR-7

Systems: Condensate Fill for Residual Heat Removal (RHR) System
Condensate Fill for Core Spray System

Valves:

51-1F090B	51-2F090A
51-1F090D	51-2F090C
51-1(2)032A,B	51-1(2)115B,D
51-1(2)1116B,D	52-1(2)048A,B
52-1(2)061	52-1(2)045B
52-1(2)046B	52-1(2)F030A,B

Category: C

Function: These check valves close to prevent a loss of inventory from the Safeguard Piping Fill System, which is required to maintain the Emergency Core Cooling System (ECCS) discharge headers filled. Those valves located in the discharge lines from Safeguard Piping Fill Pumps 1(2)AP256 and 1(2)BP256 are also required to open to maintain the ECCS discharge lines filled.

Test Requirements: ASME OM Code-1990, ISTC 4.5.2, "Exercising Requirements," and Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," Position 2, "Alternative to Full Flow Testing of Check Valves," paragraph (c), allows grouping of check valves while testing at a refuel outage only.

Justification: In accordance with GL 89-04, Position 2, paragraph (c), a sample disassembly and inspection plan has been adopted for the check valves identified above. This plan groups the valves of identical construction, which are used in similar applications, and requires testing (at least) one valve in each group during each refueling outage. Input criteria to the group selections included valve design features and materials, service conditions, maintenance/failure history and piping arrangement considerations.

Testing of these valves during non-outages provides an acceptable level of quality and safety for the following reasons:

1) All OM Code-1990 requirements, specifically, the disassembly and inspection, and the refueling outage (approximately two (2) year) frequency, are being met.

2) The non-refueling outage frequency of approximately every two (2) years is the same length of time between refueling outages.

3) Testing of these valves during non-refueling outages will not lesson the quality of the tests as compared to testing during a refueling outage.

4) Performing these tests during non-refueling outages increases system availability during outages, and reduces manpower demands during outages.

Alternative Test:

Perform code testing on Safeguard Valves during non-refueling outages approximately every two (2) years, with no restriction on plant mode (i.e., refuel outage or non-refuel outage). This relief is requested in accordance with 10 CFR 50.55a(a)(3)(i) in that the alternative testing provides an acceptable level of quality and safety.