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10CFR50.90

September 5, 2002

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

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

Subject: Supplement to License Amendment Request 01-01167

Reference: Letter from M. P. Gallagher to US NRC, dated May 14, 2002

The referenced letter proposed changes modifying Limerick Generating Station (LGS) TS requirements for a missed surveillance through revision of Specifications 4.0.1 and 4.0.3. In addition, in conjunction with the proposed changes, the referenced letter added a TS Bases Control Program consistent with the TS Bases Control Program described in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Rev. 2. The proposed changes are consistent with the NRC approved industry Technical Specification Task Force (TSTF) change TSTF-358, Revision 5 (Reference above).

The referenced letter was submitted as a Consolidated Line Item Improvement Process (CLIIP) amendment. The availability of this TS improvement was noticed in the Federal Register 66FR49714, dated September 28, 2001.

Additionally, the referenced letter also proposed administrative changes. One administrative change deleted the position of "Sr. Manager – Operations" and replaced it using an overall statement referencing the ANSI Standard for "Operations Manager". Per discussion with the NRC, the subject letter proposes to modify the statement referencing the ANSI standard. The referenced letter currently identifies a specific section in the ANSI standard, the subject letter proposes deleting this specific reference. The NRC reviewers believed that including this section reference could lead to confusion regarding which ANSI Standard section specifies the responsibilities of the Operations Manager.

The camera-ready pages for LGS Units 1 & 2 are attached to reflect this change to TS page 6-3.

Pool

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There is no impact to the No Significant Hazards Consideration submitted in the reference letter above.

Additionally, there are no commitments contained within this letter.

If you have any questions or require additional information, please contact me at (610) 765-5664.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on 09-09-02 
Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

cc: H. J. Miller, Administrator, Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS
S. Wall, Senior Project Manager, USNRC
R. R. Janati, Commonwealth of Pennsylvania

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 or another Manager in Operations shall hold a Senior Reactor Operator License.

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ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF (Continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

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- g. The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 or another Manager in Operations shall hold a Senior Reactor Operator License.

3/4.0 APPLICABILITY BASES

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 24-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that REFUELING INTERVAL surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Surveillance time interval. A delay period of up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified Surveillance time interval was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Surveillance time interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering OPERATIONAL CONDITION 1 after each fuel loading, or in accordance with 10CFR50, Appendix J, as modified by approved exemptions, etc.) is discovered to have not been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified Surveillance time interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of OPERATIONAL CONDITION changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

APPLICABILITY

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