



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 1 TO FACILITY OPERATING LICENSE NO. NPF-85

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNIT 2

DOCKET NO. 50-353

1.0 INTRODUCTION

By letter dated October 10, 1989, Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License No. NPF-85 for the Limerick Generating Station, Unit 2. The proposed amendment would revise Surveillance Requirement 4.7.4.b of the Technical Specifications (TS) to allow the first inservice visual inspection of each type of snubber to be performed after completing only three (3) months of POWER OPERATION. The proposed revision is necessary due to the efficiency with which the initial startup testing program has been conducted.

2.0 EVALUATION

The current TS Surveillance Requirement for visual inspections of snubbers requires "the first inservice visual inspection of each type of snubber shall be performed after 4 months but within 10 months of commencing POWER OPERATION and shall include all snubbers." Limerick Generating Station (LGS) Unit 2 received its full power operating license on August 25, 1989, and began POWER OPERATION, as defined by TS Definitions Table 1.2, on September 1, 1989. The first visual inspection of snubbers is therefore required to be performed between January 1, 1990 and July 1, 1990.

The Startup Testing Program for LGS-2 originally scheduled startup testing, other than the warranty run, to be completed after January 1, 1990 and the first snubber visual inspections to be completed subsequent to that testing and before the end of the ten month window. The Startup Testing Program is currently proceeding at a pace which projects a completion of the testing, other than the warranty run, during the first week in December. This rapid completion of the testing program has also led PECO to re-evaluate the most efficient use of its resources to accomplish the necessary surveillances at LGS-2. This evaluation indicates that an outage immediately following completion of the testing, other than the warranty run, is the appropriate time to conduct the first visual inspection of the snubbers. Since this outage could begin as early as the first week of December, 1989, a change to the TS is necessary.

The basis for requiring the initial visual inspection of snubbers after four months of commencing POWER OPERATION is to provide the snubbers a sufficient opportunity to experience various modes of operation (i.e., startups, shutdowns, transients and steady-state). Subjecting the snubbers to these various modes of operation establishes an operating history from which any major operational concerns can be identified. Since LGS Unit 2 will have completed its Startup Testing Program, the snubbers will have experienced these various modes of operation, established an operating history, and fulfilled the basis for performing the initial visual inspection within three months of commencing POWER OPERATION instead of four months as required by TS. Changing the minimum interval for snubber visual inspection to three months eliminates one month of what would probably be steady state operation or shutdown from the operational experience of the snubber population. Since steady state operation or shutdown does not significantly affect the visual inspection results for a snubber population early in life, one month of additional inspection time is unlikely to add to the effectiveness of this surveillance requirement. This proposed change does not alter any other TS requirement. Therefore, any system that experiences an unexpected potentially damaging transient will be inspected in accordance with TS 4.7.4.d.

Limerick, Unit 2 expects to complete the Startup Testing Program in slightly over five months. For most other recent BWRs, including Limerick, Unit 1, the average actual duration of the power ascension test program has been approximately ten months. The time period of 4 to 10 months in the present TSs was based on past experience with BWR startup test programs. The important factor in determining when the first visible inspection of the snubbers should be performed is not the calendar time but the modes of operation to which the snubbers have been exposed. By the end of Test Condition No. 6 (the end of the power ascension test program), the snubbers at Limerick, Unit 2 will have been exposed to all the programmed startups, shutdowns, transients and steady-state operation that were expected in the startup program, although in a shorter period of time than any other BWRs. Performing the visual inspections of the snubbers at the end of 3 months of Power Operation will accomplish the intended safety objective. The proposed change to the TS is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public

comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (54 FR 46152) on November 1, 1989 and consulted with the State of Pennsylvania. No public comments were received and the State of Pennsylvania did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and the security nor to the health and safety of the public.

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Dated: December 1, 1989