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

JAN 26 1981

Docket No. 50-352/353

Mr. Vincent Boyer
Senior Vice President
Nuclear Operations
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101



Dear Mr. Boyer:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - LIMERICK

As a result of our meeting in Pottstown on December 9, 1980, the staff has identified several areas and issues which need to be considered or expanded upon in the final report of the Limerick Risk Study.

The enclosure to this letter lists the eight items identified by the staff. It is hoped that this will not result in a delay in completing the final report by March 1981. If such a delay seems likely I would like to be advised as soon as possible when you can finish the report and the specific items in the enclosure that are primarily responsible for the delay.

If you have any questions contact the Limerick project manager, D. Sells, (301) 492-7792.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. Tedesco".

Robert L. Tedesco
Assistant Director for Licensing
Division of Licensing

Enclosure:
As stated

cc w/enclosure:
See next page

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ENCLOSURE

LIMERICK RISK STUDY COMMENTS

1. Emergency Procedures

The applicant should discuss how and where the emergency procedures are considered in the quantification of the risk study. In addition, he should identify those situations where conflicts in proper action may arise because of other considerations, such as operational efficiency or competing safety requirements, that the operator may be aware of or trained to consider. The applicant should discuss how he has assurance that the operators will perform the appropriate action in a conflicting emergency situation.

2. System Interdependencies

The applicant should describe how he has assured completeness in identification and treatment of system interdependencies that could fail several safety functions simultaneously, thus decreasing the plant's reliability.

3. Data Base

The applicant should provide adequate supporting information on the data base for component failure rates/unavailabilities, common cause failures, and treatment of human errors.

4. Decontamination Factors

The applicant should provide adequate supporting information on the decontamination factors used in his analysis.

5. Containment Failure Modes

The applicant should provide an expanded discussion of the containment failure modes considered and their probabilities.

6. Consequence Analyses

The applicant should provide CCDFs of latent cancers and property damage so that they can be compared to WASH-1400 reference plant.

7. Bounds

The applicant should provide a discussion of the upper bounds of his risk curves with respect to uncertainty in data, human actions, common mode failures, unidentified sequences, and external events.

8. Comparison with WASH-1400

The applicant should provide sufficient analyses that will permit independent assessments of the impact of:

- a. unique plant features, compared to the WASH-1400 reference plant;
- b. modifications to the data base and data treatment, compared to WASH-1400;
- c. assumptions regarding containment failure modes, compared to the WASH-1400 plant;
- d. assumptions regarding operator actions and common mode failure, compared to WASH-1400;
- e. assumptions regarding decontamination factors, compared to WASH-1400; and;
- f. assumptions regarding meteorology and evacuation, compared to WASH-1400.