

ATTACHMENT 2

LIMERICK GENERATING STATION

Docket No. 50-353  
License No. NPF-85

PROPOSED TECHNICAL SPECIFICATIONS CHANGES

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CONTROL ROD BLOCK INSTRUMENTATION SETPOINTS

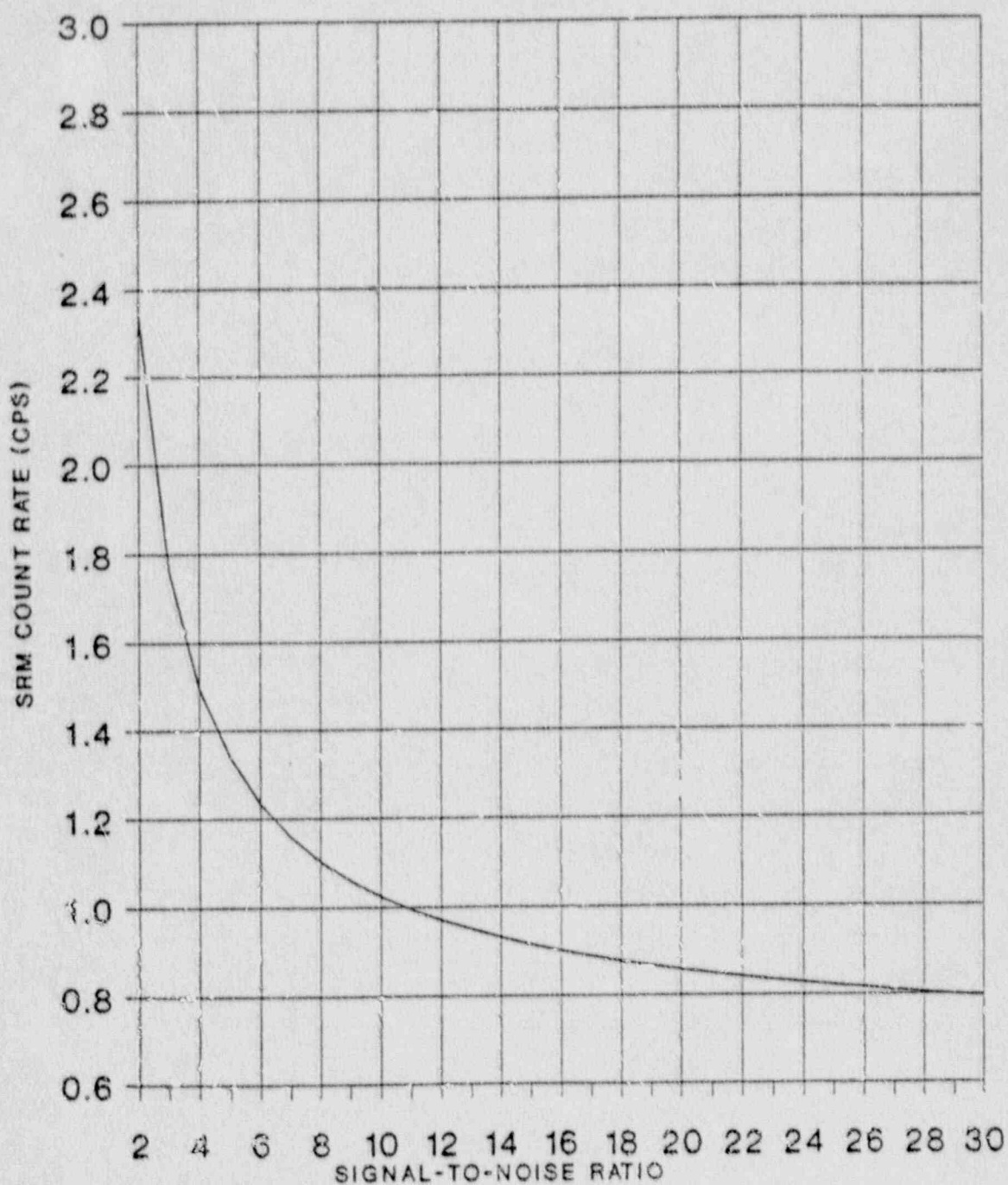
<u>TRIP FUNCTION</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
4. <u>INTERMEDIATE RANGE MONITORS</u>		
a. Detector not full in	N.A.	N.A.
b. Upscale	< 108/125 division of full scale	< 110/125 divisions of full scale
c. Inoperative	N.A.	N.A.
d. Downscale	> 5/125 divisions of full scale	> 3/125 divisions of full scale
5. <u>SCRAM DISCHARGE VOLUME</u>		
a. Water Level-High		
a. Float Switch	< 257' 7 3/8" elevation***	< 257' 9 3/8" elevation
6. <u>REACTOR COOLANT SYSTEM RECIRCULATION FLOW</u>		
a. Upscale	< 111% of rated flow	< 114% of rated flow
b. Inoperative	N.A.	N.A.
c. Comparator	< 10% flow deviation	< 11 % flow deviation
7. <u>REACTOR MODE SWITCH SHUTDOWN POSITION</u>	N.A.	N.A.

\* The rod block function varies as a function of recirculation loop drive flow (W). The trip setting of the average power range monitor rod block function must be maintained in accordance with Specification 3.2.2.

\*\* May be reduced, provided the source range monitor has an observed count rate and signal-to-noise ratio on or above the curve shown in Figure 3.3.6-1.

\*\*\* Equivalent to 13.56 gallons/scram discharge volume.





SRM COUNT RATE VERSUS SIGNAL-TO-NOISE RATIO

Figure 3.3.6-1

## INSTRUMENTATION

### SOURCE RANGE MONITORS

#### LIMITING CONDITION FOR OPERATION

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3.3.7.6 At least the following source range monitor channels shall be OPERABLE:

- a. In OPERATIONAL CONDITION 2\*, three.
- b. In OPERATIONAL CONDITION 3 and 4, two.

APPLICABILITY: OPERATIONAL CONDITIONS 2\*#, 3, and 4.

ACTION:

- a. In OPERATIONAL CONDITION 2\* with one of the above required source range monitor channels inoperable, restore at least three source range monitor channels to OPERABLE status within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours.
- b. In OPERATIONAL CONDITION 3 or 4 with one or more of the above required source range monitor channels inoperable, verify all insertable control rods to be inserted in the core and lock the reactor mode switch in the Shutdown position within 1 hour.

#### SURVEILLANCE REQUIREMENTS

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4.3.7.6 Each of the above required source range monitor channels shall be demonstrated OPERABLE by:

- a. Performance of a:
  - 1. CHANNEL CHECK at least once per:
    - a) 12 hours in CONDITION 2\*, and
    - b) 24 hours in CONDITION 3 or 4.
  - 2. CHANNEL CALIBRATION\*\* at least once per 18 months.
- b. Performance of a CHANNEL FUNCTIONAL TEST:
  - 1. Within 24 hours prior to moving the reactor mode switch from the Shutdown position, if not performed within the previous 7 days, and
  - 2. At least once per 31 days.
- c. Verifying, prior to withdrawal of control rods, that the SRM count rate is at least 3.0 CPS\*\*\* with the detector fully inserted.#

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\* With IRM's on range 2 or below.

\*\* Neutron detectors may be excluded from CHANNEL CALIBRATION.

\*\*\* May be reduced, provided the source range monitor has an observed count rate and signal-to-noise ratio on or above the curve shown in Figure 3.3.6-1.

# During initial startup test program, SRM detectors may be partially withdrawn prior to IRM on-scale indication provided that the SRM channels remain on scale above 100 cps and respond to changes in the neutron flux.

## REFUELING OPERATIONS

### SURVEILLANCE REQUIREMENTS (Continued)

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- b. Performance of a CHANNEL FUNCTIONAL TEST:
  - 1. Within 24 hours prior to the start of CORE ALTERATIONS, and
  - 2. At least once per 7 days.
  
- c. Verifying that the channel count rate is at least 3.0 cps: \*
  - 1. Prior to control rod withdrawal,
  - 2. Prior to and at least once per 12 hours during CORE ALTERATIONS, and
  - 3. At least once per 24 hours.
  
- d. Verifying, within 8 hours prior to and at least once per 12 hours during, that the RPS circuitry "shorting links" have been removed during:
  - 1. The time any control rod is withdrawn, \*\* or
  - 2. Shutdown margin demonstrations.

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\*May be reduced, provided the source range monitor has an observed count rate and signal-to-noise ratio on or above the curve shown in Figure 3.3.6-1. These channels are not required when sixteen or fewer fuel assemblies, adjacent to the SRMs, are in the core.

\*\*Not required for control rods removed per Specification 3.9.10.1 or 3.9.10.2.



GENERAL ELECTRIC COMPANY

AFFIDAVIT

1, Rudolph Villa, being duly sworn, depose and state as follows:

1. I am Manager, Consulting Services, General Electric Company, and have been delegated the function of reviewing the information described in paragraph 2 which is sought to be withheld and have been authorized to apply for its withholding.
2. The information sought to be withheld is contained in "SRM Count Rate vs S/N Ratio for Philadelphia Electric Company Limerick Unit 2 (EDE-10-0489).
3. In designating material as proprietary, General Electric utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it... A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information... Some factors to be considered in determining whether given information is one's trade secret are: 1) the extent to which the information is known outside of his business; 2) the extent to which it is known by employees and others involved in his business; 3) the extent of measures taken by him to guard the secrecy of the information; 4) the value of the information to him and to his competitors; 5) the amount of effort or money expended by him in developing the information; 6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
  - a. Information that discloses a process, method or apparatus where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
  - b. Information consisting of supporting data and analyses, including test data, relative to a process, method or apparatus, the application of which provide a competitive

economic advantage, e.g. by optimization or improved marketability;

- c. Information which if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product;
  - d. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of General Electric, its customers or suppliers;
  - e. Information which reveals aspects of past, present or future General Electric customer-funded development plans and programs of potential commercial value to General Electric;
  - f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
  - g. Information which General Electric must treat as proprietary according to agreements with other parties.
5. Initial approval of proprietary treatment of a document is typically made by the Subsection manager of the originating component, the person who is most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the Company is limited on a "need to know" basis and such documents are clearly identified as proprietary.
6. The procedure for approval of external release of such a document typically requires review by the Subsection Manager, Project Manager, Principal Scientist or other equivalent authority, by the Subsection Manager of the cognizant Marketing function (or delegate) and by the Legal Operation for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside General Electric are generally limited to regulatory bodies, customers and potential customers and their agents, suppliers and licensees then only with appropriate protection by applicable regulatory provisions or proprietary agreements.
7. The document mentioned in paragraph 2 above has been evaluated in accordance with the above criteria and procedures and has been found to contain information which is proprietary and which is customarily held in confidence by General Electric.
8. The information to the best of my knowledge and belief has consistently been held in confidence by the General Electric Company, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties have been made



pursuant to regulatory provisions of proprietary agreements which provide for maintenance of the information in confidence.

9. Public disclosure of the information sought to be withheld is likely to cause substantial harm to the competitive position of the General Electric Company and deprive or reduce the availability of profit making opportunities because it would provide other parties, including competitors, with valuable information.

STATE OF CALIFORNIA        )  
COUNTY OF SANTA CLARA    ) ss:

Rudolph Villa, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at San Jose, California, this 18<sup>th</sup> day of April, 1989.

Rudolph Villa  
Rudolph Villa  
General Electric Company

Subscribed and sworn before me this 18<sup>th</sup> day of April, 1989.

Lydia M. Simpson  
NOTARY PUBLIC, STATE OF CALIFORNIA

