



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

March 6, 1990

Docket Nos. 50-352
and 50-353

Mr. George A. Hunger, Jr.
Director-Licensing, MC 5-2A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: GENERIC LETTER 88-01 (TAC NOS. 69143 AND 69144)

RE: LIMERICK GENERATING STATION, UNITS 1 AND 2

Your letters of August 2, 1988, April 28, 1989, May 30, 1989 and September 11, 1989 responded to Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping." We have completed our review of your submittals with the assistance of a contractor, Viking Systems International. Our Safety Evaluation and our Contractor's Technical Evaluation Report (TER) are enclosed.

The generic letter requested that you address five specific items and your proposed actions on 13 staff positions. Your responses to the five items is acceptable except for the following:

1. Item 2 requested that you provide the actual list of welds that you were going to examine at the last refueling outage. You stated that the GL 88-01 requirements would be integrated with the regular ISI program and that inspections will be performed at frequencies which will be in conformance with the Staff Positions on Inspection Schedules.

This is not specific enough to assess the scope of your program. Accordingly, it is requested that you submit your IGSCC inspection plans for staff review at least three months prior to the beginning of each refueling outage.

2. Item 3 requested that you submit an application to amend the Limerick Technical Specifications (TSs) to include a statement in the section on ISI that the Inservice Inspection Program for piping covered by the scope of GL 88-01 will be in conformance with the staff position on schedule, methods and personnel and sample expansion. You and some other BWR licensees took exception to this request. The staff reevaluated this issue and concluded that this requirement needed to be in the TSs. As part of the TS improvement program, surveillance requirement 3.0.5 will be relocated to the Administrative Controls section of the STS. You are requested to submit a TS change to include the statement on the ISI program as initially proposed in your letter of August 2, 1988.

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3. Item 4 requested BWR licensees to amend the TSs to incorporate the staff position on unidentified leakage - specifically, that unidentified leakage be limited to an increase in leakage of 2 gpm over a 24 hour period, that total unidentified leakage be limited to 5 gpm and that leakage be monitored every four hours. Your letter of August 2, 1988 discussed reasons why you concluded the present TS requirements were adequate. Most other BWR licensees also took exception to the leakage detection requirements in GL 88-01. The staff reassessed the leakage requirements and concluded that, with one exception, they were reasonable and necessary. The staff agreed that monitoring leakage every four hours would create an unnecessary administrative hardship. The staff position was modified to require that leakage be monitored every eight (8) hours. It is requested that you submit an application to revise the Limerick TSs to incorporate the above limits on unidentified leakage.

Your responses on the 13 staff positions are acceptable except for the following:

1. As a result of the fuel failures in the second fuel cycle of Unit 1, there were many discussions and presentations by your staff on proposed improvements to the water chemistry program. These improvements go well beyond the "BWR Water Chemistry Control Program" dated December 11, 1987 referred to on page 4 of your August 2, 1988 letter. We assume that the actions and commitments you made in your letter of April 3, 1989 to avoid future CILC related fuel failures at Limerick, Units 1 and 2, supersede the discussion of water chemistry in your August 2, 1988 letter. Your proposed actions included improved performance of the condensate filter/demineralizers, improved monitoring methods and instrumentation, minimizing copper in the feedwater, limiting chemical transients and total organic carbon and installation of full-flow, deep-bed demineralizers at the next refueling outages for Units 1 and 2. On the basis of the later submittals, we find your water chemistry program acceptable. In fact, the actions and evaluations undertaken by your plant chemistry staff following the recent condenser tube leaks in Unit 1 is commendable. Our contractor did not have the benefit of the discussions and submittals related to the Unit 1 fuel failures; hence, the enclosed TER does not fully reflect the above staff determination.
2. You discussed your plans to notify the NRC of any flaws that do not meet IWB-3500 criteria of Section XI of the Code for continued operation and to obtain NRC approval of the disposition for each flaw exceeding the criteria before resuming operation. You made a very good submittal on the indication you found during the second refueling outage in the Limerick, Unit 1 recirculation riser nozzle to safe end weld. In your submittals on GL 88-01, you did not address your general position on use of weld overlays and clamping devices or long range plans, if any, for stress improvement of welds in Unit 1.

Mr. George A. Hunger

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3. It was not clear whether you plan to inspect the 195 category G welds in the Reactor Water Cleanup System beyond the outer containment isolation valve.

We suggest a meeting with your staff to resolve the items discussed in this letter and Safety Evaluation.

Sincerely,

Original signed by
Richard J. Clark

Richard J. Clark, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Safety Evaluation
2. Technical Evaluation Report

cc w/enclosures:
See next page

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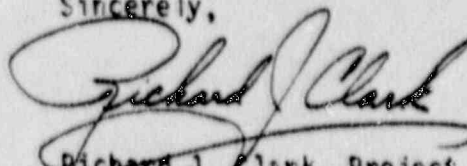
Mr. George A. Hunger

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Richard J. Clark, Project Manager
Project Directorate 1-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Safety Evaluation
2. Technical Evaluation Report

cc w/enclosures:
See next page

Mr. George A. Hunger, Jr.
Philadelphia Electric Company

Limerick Generating Station
Units 1 & 2

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