

## PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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WAYNE, PA 19087-5691

(215) 640-6000

March 20, 1990

Docket No. 50-352  
License No. NPF-39U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555SUBJECT: Limerick Generating Station, Unit 1  
Technical Specifications Change Request

Dear Sir:

Philadelphia Electric Company (PECo) hereby submits Unit 1 Technical Specifications Change Request No. 89-06, in accordance with 10 CFR 50.90, requesting an amendment to the Technical Specifications (Appendix A) of Operating License No. NPF-39. Information supporting this Change Request, which makes administrative changes to eliminate differences between Unit 1 and Unit 2 Technical Specifications, is contained in Attachment 1 to this letter. The proposed replacement pages are contained in Attachment 2. All proposed changes are indicated in the text by revision bars in the margin.

If you have any questions regarding this matter, please contact us.

Very truly yours,

G. A. Hunger, Jr.  
Director  
Licensing Section  
Nuclear Services Department

## Attachments

cc: W. T. Russell, Administrator, Region 1, USNRC  
T. J. Kenny, USNRC Senior Resident Inspector, LGS  
T. M. Gerusky, Director, PA Bureau of Radiological Protection

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TECHNICAL SPECIFICATIONS CHANGE REQUEST  
NO. 89-06

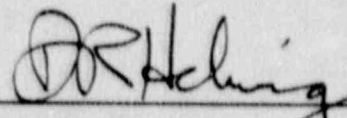
COMMONWEALTH OF PENNSYLVANIA :

: SS.

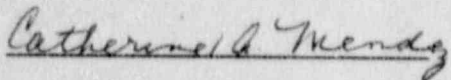
COUNTY OF CHESTER :

D. R. Helwig, being first duly sworn, deposes and says:

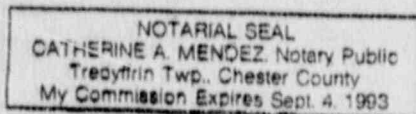
That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses to make administrative changes to eliminate differences between Unit 1 and Unit 2 Technical Specifications, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Vice President

Subscribed and sworn to  
before me this 20<sup>th</sup> day  
of March, 1990.



Notary Public



ATTACHMENT 1

LIMERICK GENERATING STATION

UNIT 1

Docket No. 50-352

License No. NPF-39

TECHNICAL SPECIFICATIONS CHANGE REQUEST

Proposed Changes to the Technical Specifications  
to Eliminate Differences Between Unit 1 and Unit 2  
Technical Specifications

Supporting Information for Changes - 8 pages

Philadelphia Electric Company (PECo), Licensee under Facility Operating License NPF-39 for Limerick Generating Station (LGS), Unit 1, hereby requests that the Technical Specifications (TS) contained in Appendix A of the Operating License be amended as proposed herein to make various administrative changes to eliminate differences between the Unit 1 and Unit 2 TS. The proposed changes are listed and the proposed change pages are provided in Attachment 2. The proposed changes are indicated by vertical bars in the margin of the pages. PECO requests the changes proposed herein to be effective upon issuance of the Amendment.

This change request provides a discussion and description of the proposed TS changes, a safety assessment of the proposed TS changes, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

#### Discussion and Description of Changes

The proposed changes to the LGS Unit 1 TS are identified on the the "List of Changes" contained in the front of Attachment 2. These changes have been divided into seven (7) groups as shown by the numbers in the left hand column of the List. A discussion of each group is provided below by the corresponding numbers. The proposed changes that are editorial changes are identified as such on the "List of Changes" and no further discussion is provided below.

1. Revise Note \* in Table 3.3.2-1, Table 4.3.2.1-1 and Section 3.6.5.2.2 of the TS in accordance with the changes previously made to Note \* in

TS Sections 3.6.5.1.2 and 3.6.5.3 by Unit 1 TS Amendment 29. These changes clarified the definition of OPERATIONAL CONDITION \* but the changes were not implemented in every TS which references OPERATIONAL CONDITION \*. This is an administrative change to achieve consistency throughout the Unit 1 TS and to eliminate differences between Unit 1 and Unit 2 TS.

2. Revise TS Section 4.3.7.2.2 by incorporating the changes incorporated by NRC in the original Unit 2 TS. This change is an administrative change to clarify the fact that some seismic instruments are not accessible during power operation and to clarify when these instruments are required to be restored to OPERABLE status following an actuation.

Revise TS Table 3.3.7.2-1 to replace the triaxial seismic trigger and switches range information with notes which provide setpoint information. This is an administrative change to correct an error. Providing range information for the trigger and switches is not meaningful because their function is to activate recording equipment at a given setpoint. Therefore, the appropriate information to be included is the setpoint.

Add for clarification, the location of the seismic trigger and the response spectrum analyzer since these locations were originally omitted from the Table. All of the above proposed changes will eliminate differences between Unit 1 and Unit 2 TS.

3. Delete the statements/note from TS Sections 4.6.5.3.g and 4.7.2e.3 and TS Bases 3/4.6.5 which refer to "initial criticality of Unit 2"

and "the issuance of the Unit 2 full power operating license." These events have already occurred and therefore the statements/note no longer apply and can be administratively removed.

4. Add "- COMMON SYSTEM" to the TS Section 3/4.6.5.3 title for Standby Gas Treatment System (SGTS) and to the TS Section 3/4.7.2 title for Control Room Emergency Fresh Air Supply System (CREFAS). The NRC proposed and implemented the same editorial change to the Residual Heat Removal Service Water System (RHRSW) and the Emergency Service Water System (ESW) in Unit 1 TS Amendment 27 to clearly alert the operators that there is an interdependency between units. This same interdependency exists for SGTS and CREFAS and the proposed change will achieve consistency throughout the Unit 1 TS. The appropriate changes to the corresponding TS Index pages and Bases pages will also be made. This change was incorporated by the NRC throughout the original Unit 2 TS for the SGTS, CREFAS, RHRSW and ESW.
5. Revise the ACTION statements for the diesel generators in TS Section 3.9.1.1 to incorporate the more restrictive ACTION requirements which were administratively required by PORC Position 45 as committed to in our June 14, 1989 letter to the NRC and incorporated in the original Unit 2 TS.

During the development of the Unit 2 TS, the NRC determined that the proposed TS ACTION requirements for an inoperable diesel generator were not restrictive enough. Specifically, the NRC concluded that a 92 day allowable out-of-service time (AOT) for one diesel generator was too long, therefore the probability of failure of a second diesel generator, if required, was too high. This became critical if

certain combinations of diesel generators became unavailable, resulting in two-train safety systems without the capability of being powered by an OPERABLE on-site power source. Thus, the 92 day AOT was reduced to 30 days.

Also, due to the system loading of the diesel generators, ACTION 'e' was revised to reflect that if one (no longer two) diesel generator becomes inoperable, the redundant systems fed from the remaining OPERABLE diesel generator(s) must be OPERABLE.

The 30 day allowable out-of-service time (AOT) and the revised ACTION 'e' are more restrictive than the requirements presently contained in the Unit 1 TS, which were originally determined to be acceptable by the NRC for operation of Unit 1 as a single unit station. A note will also be added to TS ACTIONS 'a', 'b', 'c', 'd', and 'h' to serve as a reminder to the operators to consider the special requirements of ACTION 'e.' The Unit 1 TS Bases 3/4.8 will also be revised to incorporate, as appropriate, the changes made by the NRC to the Unit 2 TS Bases which were required by the revision of the ACTION statements. These are administrative changes which incorporate more restrictive requirements and which will eliminate differences between Unit 1 and Unit 2 TS.

6. Add a statement to TS Bases 3/4.4.3.2 concerning the ACTION requirements for pressure isolation valves. This is an administrative change to the TS Bases which was requested by the NRC during the development of the Unit 2 TS in order to clarify the existing bases. This change will eliminate differences between the Unit 1 and Unit 2 TS.

7. Add an asterisk to the title of TS Section 6.9.1.6, "Monthly Operating Reports," to indicate that a single submittal of the report is made for both units. This is an administrative change to achieve consistency between Unit 1 and Unit 2 TS.

#### Safety Assessment

The proposed changes to the TS will achieve consistency throughout the TS, provide clarification, correct errors, eliminate statements that no longer apply, and make editorial changes. These are purely administrative changes. The proposed diesel generator TS ACTION changes administratively incorporate into the TS previously implemented requirements that are more restrictive than the requirements presently included in the TS. The proposed changes to the TS do not affect plant design, hardware, system operation, or procedures. Therefore, the changes do not impact any accidents previously evaluated in the SAR nor any equipment important to safety.

#### Information Supporting a Finding of No Significant

#### Hazards Consideration

We have concluded that the proposed changes to the LGS Unit 1 TS, which make administrative changes to eliminate differences between Unit 1 and Unit 2 TS do not constitute a significant hazards consideration. In support of this determination, an evaluation of each of the three standards set forth in 10 CFR 50.92 is provided below.

1. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.



The proposed changes to the TS will achieve consistency throughout the TS, provide clarification, correct errors, eliminate statements that no longer apply, and make editorial changes. These are purely administrative changes. The proposed diesel generator TS ACTION changes administratively incorporate into the TS previously implemented requirements that are more restrictive than the requirements presently included in the TS. The proposed changes to the TS do not affect plant design, hardware, system operation, or procedures. Therefore, the proposed changes will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or difference kind of accident from any accident previously evaluated.

As discussed in item 1. above, the proposed TS changes are purely administrative changes and do not affect plant design, hardware, system operation, or procedures. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed changes do not involve a significant reduction in a margin of safety.

As discussed in Item 1. above, the proposed TS changes are purely administrative changes and do not affect plant design, hardware system operation, on procedures. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Information Supporting an Environmental Assessment

An environmental assessment is not required for the changes proposed by this Change Request because the requested changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment. This Change Request does not involve a significant hazards consideration as discussed in the preceding section. This Change Request does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, this Change Request does not involve a significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the TS and have concluded that they do not involve an unreviewed safety question or a significant hazards consideration, and will not endanger the health and safety of the public.