PECO ENERGY

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March 22, 1994

Docket Nos. 50-352
50-353
License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 and 2
Technical Specifications Change Request No. 93-19-0
Increase in Spent Fuel Storage Capacity

Gentlemen:

By letter dated January 14, 1994, PECO Energy Company submitted Technical Specifications (TS) Change Request No. 93-19-0 for Limerick Generating Station (LGS), Units 1 and 2, to facilitate an increase in the spent fuel pool storage capacity. The proposed TS change is necessary to support implementation of a modification to install new high density spent fuel storage racks in each of the spent fuel pools at LGS. Installation of the new spent fuel storage racks will increase the spent fuel storage capacity in each spent fuel pool from 2040 fuel assemblies to 4117 fuel assemblies. In our January 14, 1994 letter, we requested that the NRC review this TS Change Request and, if approved, issue the amendments by June 15, 1994, to facilitate implementation of the spent fuel pool rerack modifications for LGS, Units 1 and 2.

Subsequently, during a meeting between PECO Energy Company and NRC representatives on March 16, 1994, the NRC indicated that it will be difficult to process and approve this TS Change Request by June 15, 1994, and it is necessary for us to substantiate this schedule by providing additional justification if the amendments are needed by June 15, 1994.

Therefore, PECO Energy is providing the following information to justify the necessity of having these amendments issued by June 15, 1994.

> The spent fuel pool rerack modification work was originally scheduled for implementation in 1996. By letter dated June 23, 1993, the NRC issued Amendment Nos. 62 and 27 to Facility Operating License Nos. NPF-39 and NPF-85 for LGS, Units 1 and 2, respectively, to allow for the receipt, possession, and use of fuel assemblies from the Shoreham Nuclear Power Station. As a result of the Shoreham fuel transfer activities it was necessary to reschedule the rerack modification work to 1994.
>
> As indicated in our January 14, 1994 letter, the spent fuel pool reracking modification will be completed on Unit 2 first. The Unit 2 reracking work is currently scheduled to begin at the end of June, 1994. The reracking work is expected to take approximately four (4) months and is scheduled to be completed prior to next Unit 2 refueling outage scheduled to begin in January, 1995. The plan for reracking the Unit 2 spent fuel pool is based on moving all of the fuel in the Unit 2 spent fuel pool into the Unit 1 spent fuel

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pool, and performing the rerack operation without any spent fuel in the Unit 2 spent fuel pool in order to maintain personnel exposure As Low As Reasonably Achievable (ALARA). This will require additional fuel storage capability in the Unit 1 spent fuel pool to facilitate the transfer of the Unit 2 spent fuel assemblies. To accomplish this spent fuel transfer, six (6) existing Unit 2 fuel storage racks will be installed in the Unit 1 spent fuel pool. However, the current TS requirements limit spent fuel storage capacity in each spent fuel pool to 2040 fuel assemblies. Moving the Unit 2 spent fuel assemblies to the Unit 1 spent fuel pool as proposed, in conjunction with the ongoing transfer of Shoreham fuel to LGS, would result in exceeding the licensed fuel storage capacity for Unit 1.

If the TS Change Request is not approved in time to support the modification schedule as requested, we will be forced to perform the Unit 2 spent fuel pool reracking work under water with spent fuel in the pool. This will most likely result in increased personnel exposures, and could significantly increase the possibility of personnel overexposure when reracking work is conducted underwater with spent fuel present in the pool. In addition, the project costs are expected to increase due to 1) increased complexity of installation, 2) longer installation duration, 3) additional fuel moves, 4) greater Health Physics involvement, and 5) fuel storage rack constraints.

In addition, we have enclosed a tabulation (Enclosure 1) of the existing number of spent fuel assemblies in the LGS spent fuel pools, and a simple timeline (Enclosure 2) depicting the specific tasks and duration for completing the installation of the Unit 2 spent fuel pool rerack modification.

If you have questions or require additional information, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr., Director
Licensing Section

Enclosures

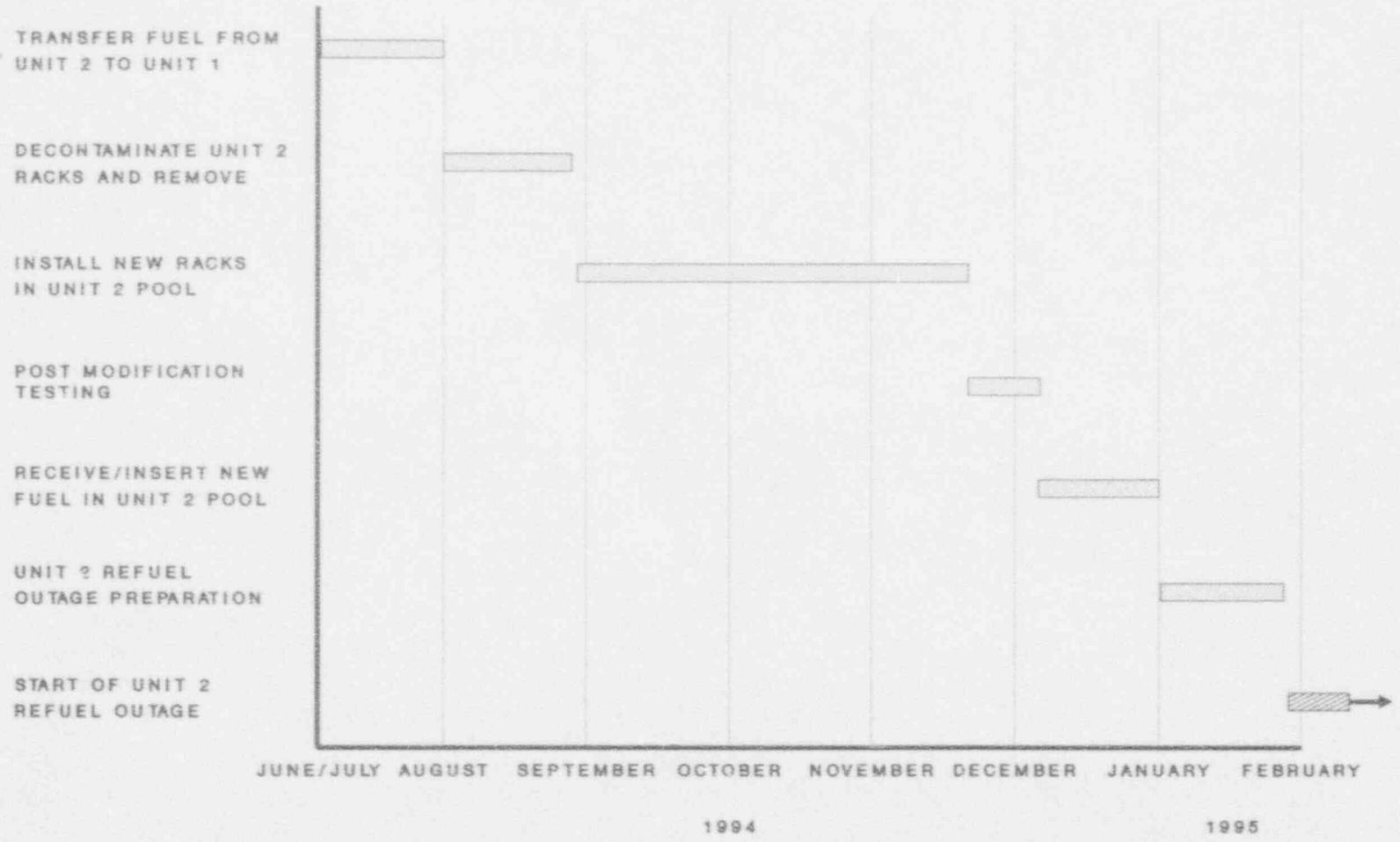
cc: T. T. Martin, Administrator, Region I, USNRC (w/ enclosures)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ enclosures)

Limerick Generating Station
Units 1 and 2
Existing Spent Fuel Storage Capacity

Unit 1 Spent Fuel Pool	Unit 2 Spent Fuel Pool
1281 - Existing Number of Spent Fuel Assemblies (1)	975 - Existing Number of Spent Fuel Assemblies
2021 - Total Number of Storage Cells in Spent Fuel Pool	1287 - Total Number of Storage Cells in Spent Fuel Pool
(1) - Includes Shoreham fuel assemlies received to date.	

Note: The values specified in the table above do not include 237 Shoreham fuel assemblies expected to be delivered from the Shoreham Nuclear Power Station between now and July 1, 1994.

LIMERICK GENERATING STATION
UNIT 2
SPENT FUEL POOL RERACK INSTALLATION SCHEDULE



ENCLOSURE 2