

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5891

March 24, 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

Gentlemen:

PECO Energy Company is submitting Technical Specifications (TS) Change Request No. 92-19-0, in accordance with 10 CFR 50.90, requesting an amendment to the TS (Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station, Units 1 and 2, respectively. This proposed TS change involves revising the TS to support a change in the frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from semiannually to annually. Information supporting this TS Change Request is contained in Attachment 1 of this letter, and the proposed replacement pages for the LGS, Units 1 and 2, TS area contained in Attachment 2.

We request that, if approved, the amendments to the LGS, Units 1 and 2, TS be effective immediately upon issuance of the amendments.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.
Director
Licensing Section

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/ attachments)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ attachments)
W. P. Dornsife, Director, PA Bureau of Radiation Protection (w/ attachments)

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ADD 1

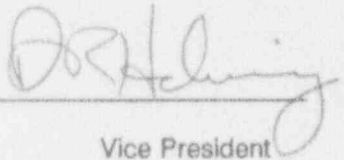
COMMONWEALTH OF PENNSYLVANIA:

: ss.


COUNTY OF CHESTER :

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

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the foregoing Technical Specifications Change Request No. 92-19-0 for Limerick Generating Station, Units 1 and 2, Facility Operating License Nos. NPF-39 and NPF-85, to change the frequency for submitting the Semiannual Radiological Effluent Release Report from semiannually to annually, 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 22nd day
of March 1994.


Notary Public

Notarial Seal
Eric A. Santori, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

ATTACHMENT 1

LIMERICK GENERATING STATION

UNITS 1 AND 2

DOCKET NOS. 50-352
 50-353

LICENSE NOS. NPF-39
 NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

No. 92-19-0

"Revise Technical Specifications to Support Change in the Frequency for
Submitting the Semiannual Radioactive Effluent Release Report to
the NRC from Semiannually to Annually"

Supporting Information for Changes - 3 pages

PECO Energy Company, Licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station, Units 1 and 2, respectively, requests that the Technical Specifications (TS) contained in Appendix A to the Operating Licenses be amended as proposed herein, to revise TS Definition 1.24 and TS Sections 3.11.1.4, 6.9.1.8, and 6.14.1 to support a change in frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from semiannually to annually. The proposed changes to the TS are indicated by a vertical bar in the margin of the affected TS pages. The TS pages showing the proposed changes are contained in Attachment 2.

We request that, if approved, the TS changes proposed herein be effective immediately upon issuance of the amendments.

This TS 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 the Proposed Changes

The Technical Specifications (TS) currently require that the Semiannual Radioactive Effluent Release Report be submitted to the NRC on a semiannual basis to provide a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released to unrestricted areas from Limerick Generating Station (LGS), Unit 1 and 2. On August 31, 1992, the NRC promulgated Final Rule (i.e., 57FR39353), "Reducing the Regulatory Burden on Nuclear Licensees," which amended 10 CFR 50.36a, "Technical Specifications on Effluents from Nuclear Power Reactors," to reduce the frequency for submitting radiological effluent release data from semiannually to annually.

The proposed TS changes involve revising TS Definition 1.24 and TS Sections 3.11.1.4, 6.9.1.8, and 6.14.1 to require that the Semiannual Radioactive Effluent Release Report be submitted to the NRC annually. This proposed TS change implements the amended reporting requirements of 10 CFR 50.36a, as stipulated in the final rule (i.e., 57FR39353) for submitting radiological effluent release data.

Safety Assessment

On August 31, 1992, the NRC promulgated Final Rule (i.e., 57FR39353), "Reducing the Regulatory Burden on Nuclear Licensees," which amended 10 CFR 50.36a, "Technical Specifications on Effluents from Nuclear Power Reactors," requiring that each licensee submit a report annually specifying the quantity of each of the principal radionuclides released to unrestricted areas in liquid and in gaseous effluents during the previous 12 months of operation.

Currently, the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) require that a report (i.e., Semiannual Radioactive Effluent Release Report) be submitted to the NRC on a semiannual basis summarizing the quantities of radioactive liquid and gaseous effluents and solid waste released from the site. This proposed TS change involves revising the TS to change the frequency for submitting the Semiannual Radioactive Effluent Release Report from semiannually to annually. This proposed change is administrative in nature and will implement the amended reporting requirements in 10CFR50.36a as stipulated in the Final Rule 57FR39353.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) to revise the frequency for submitting radiological effluent release data from semiannually to annually do not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

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

The proposed TS changes are administrative in nature. The proposed changes simply involve revising the frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from semiannually to annually in order to implement the amended reporting requirements of 10CFR50.36a as promulgated in Final Rule 57FR39353. Since the information contained in this report is reviewed and evaluated after the effluents are released, no accidents previously evaluated are impacted by the proposed TS changes. Radiological effluent releases from the station will continue to be controlled as required by the TS, including those requirements specified in the Offsite Dose Calculation Manual (ODCM) and Process Control Program (PCP). The proposed TS changes do not involve any changes to the operation or physical configuration of any plant systems or equipment. The proposed changes do not impact any initial or final accident conditions or assumptions previously evaluated. The radiological consequences of these previously evaluated accidents are not affected by the proposed changes.

Therefore, the proposed TS changes do not involve an increase in the probability or consequences of an accident previously evaluated.

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

The proposed TS changes are administrative in nature. The proposed changes simply involve revising the frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from semiannually to annually in order to implement the amended reporting requirements of 10CFR50.36a as promulgated in Final Rule 57FR39353. Radiological effluent releases from the station will continue to be controlled as required by the TS, including those requirements specified in the ODCM and PCP. The proposed TS changes do not involve any modifications to plant systems or equipment.

Therefore, the proposed TS changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed TS changes are administrative in nature, and will only involve revising the frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from semiannually to annually as currently stipulated in 10CFR50.36a. The specific radiological effluent release information contained in this report will continue to be provided as required. The station radiological effluent releases will continue to be controlled as required by TS, including those requirements specified in the ODCM and PCP.

Therefore, the proposed TS changes do not involve a 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 to the LGS, Units 1 and 2, TS 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. The proposed changes do not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and Nuclear Review Board have reviewed this proposed change to the LGS, Units 1 and 2, TS and have concluded that they do not involve an unreviewed safety question, and will not endanger the health and safety of the public.