



PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesternook Boulevard
Wayne, PA 19087-5691

March 30, 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
Delayed Submittal of Proposed Technical Specifications Change
Regarding Station Batteries

Gentlemen:

By letter dated September 10, 1993, PECO Energy Company made a commitment to submit an additional proposed Technical Specifications (TS) change regarding station battery TS Surveillance Requirements (SRs). The commitment was added to the September 10, 1993 letter which was in response to a Request for Additional Information (RAI) regarding Technical Specifications (TS) Change Request No. 92-03-0 that proposed to increase the surveillance interval from a nominal 18 months to a nominal 24 months for certain TS SRs associated with instrument calibrations.

The commitment was to incorporate the modified performance test and frequency described in the 1993 draft revision of the Institute of Electrical and Electronics Engineers (IEEE) Standard 450, "IEEE Recommended Practice for Maintenance and Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," into Limerick Generating Station TS SRs Sections 4.8.2.1.e, and 4.8.2.1.f. Based on discussions with the NRC about the draft IEEE Standard 450 and the assumption made by both PECO and the NRC that the draft was in its final version and was

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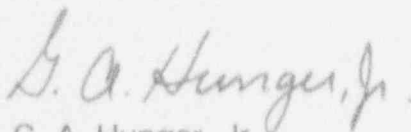
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expected to be issued shortly, PECO expected to submit the additional proposed TS change by the end of March, 1994. However, since the September 10, 1993 letter, the modified performance test described by the draft IEEE Standard 450 and its proposed substitution for the performance test has become an unresolved issue warranting further review by members of the IEEE Battery Working Group (BWG). A meeting has been scheduled for April 12, 1994 for the nuclear members of the BWG, to discuss whether the modified performance test can satisfy the performance test criteria. After the April 12 meeting, we will be able to assess the information presented by the knowledgeable parties and will be better informed to determine how this issue can be resolved in the most expeditious fashion in order to ensure appropriate LGS 24 month fuel cycle TS SRs.

Therefore, we will not be submitting the additional proposed TS change in March of 1994 as stated in the September 10, 1993 RAI letter; however, we will submit the additional proposed TS change once the IEEE Standard 450 is approved. We will be able to support our current 24 month fuel cycles in accordance with our current TS SRs provided our current proposed TS Change Requests Nos. 92-02-0, and 92-03-0 are approved before the end of May, 1994.

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 Radiological Protection
(w/ attachments)