

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

December 21, 1990

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:

Philadelphia Electric Company is submitting Technical Specifications Change Request No. 90-21-0, in accordance with 10 CFR 50.90, requesting an amendment to the Technical Specifications (TS) (Appendix A) of Operating License Nos. NPF-39 and NPF-85. Information supporting this Change Request is contained in Attachment 1 to this letter, and the proposed replacement pages are contained in Attachment 2.

This submittal requests changes to: 1) TS Section 4.0.5 to indicate Inservice Inspection Program conformance with NRC staff positions identified in NRC Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," 2) TS Section 3.4.3.2 to add a limit of 2 gpm increase in UNIDENTIFIED LEAKAGE over a 24 hour period, 3) TS Section 4.4.3.2 to increase the frequency of monitoring drywell floor drain sump and drywell equipment drain tank flow rate to once every eight (8) hours, and 4) the pertinent TS Bases. These changes are being requested as committed in our June 8, 1990 response to NRC GL 88-01.

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

Very truly yours,

G. J. Beck  
Manager, Licensing  
Nuclear Engineering and Services

GHS/eas:3006

Attachments

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

9012280146 901221  
PDR ADOCK 05000352  
PDR

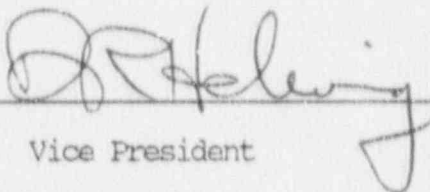
*Adol*

27 100

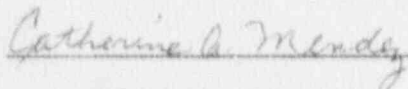
COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
COUNTY OF CHESTER :

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 License Nos. NPF-39 and NPF-85 (Technical Specifications Change Request No. 90-21-0) to conform with the guidance provided in NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austentic Stainless Steel Piping," 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 21<sup>st</sup> day  
of December, 1990.



Notary Public  
NOTARIAL SEAL  
CATHERINE A. MENDEZ, Notary Public  
Tredyffrin Twp., Chester County  
My Commission Expires Sept. 4, 1993

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

"Inservice Inspection Program/Reactor Coolant System UNIDENTIFIED LEAKAGE"

Supporting Information for Changes - 5 pages

Philadelphia Electric Company (PECO), Licensee under Facility Operating Licenses NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively, requests that the Technical Specifications (TS) contained in Appendix A of the Operating Licenses be amended as proposed herein to reflect conformance with the guidance provided in NRC Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," as committed in our response to NRC GL 88-01 dated June 8, 1990. The proposed TS changes are indicated by a vertical bar in the margin of TS pages 3/4 0-3, 3/4 4-9, and 3/4 4-10, and Bases pages B 3/4 0-5, B 3/4 4-3, B 3/4 4-4, and B 3/4 4-6 for LGS, Unit 1, and TS pages xix (INDEX), 3/4 0-3, 3/4 4-9, and 3/4 4-10, and Bases pages B 3/4 0-5, B 3/4 4-3, B 3/4 4-3a, and B 3/4 4-6 for LGS, Unit 2, and are contained in Attachment 2.

We request the changes proposed herein be effective 30 days from the date of issuance of the Amendments.

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 the Proposed Changes

NRC GL 88-01, issued January 25, 1988, provided guidance in the form of NRC positions regarding Intergranular Stress Corrosion Cracking (IGSCC) problems in Boiling Water Reactor (BWR) piping made of austenitic stainless steel that is four (4) inches or larger in nominal diameter and contains reactor coolant at a temperature above 200 degrees F during reactor power operation regardless of ASME Code classification. These NRC positions were the result of research and development sponsored by the BWR Owners Group, along with other related work by vendors, consulting firms, and confirmatory research sponsored by the NRC. NRC GL 88-01 requested licensees of operating BWRs and holders of construction permits for BWRs to provide information regarding conformance with the NRC positions. Two of the items which the GL requested licensees to address were: 1) a TS change to include a statement in the TS section on Inservice Inspection (ISI) that the ISI Program for piping covered by the scope of NRC GL 88-01 will be in conformance with the NRC positions on schedule, methods and personnel, and sample expansion included in the GL, and 2) confirmation of the licensees plans to ensure that the TS related to leakage detection will be in conformance with the NRC positions on leak detection included in the GL. The NRC position on leakage detection specifically stated that unidentified leakage be limited to an increase of 2 gpm over a 24 hour period, and that leakage be monitored every four (4) hours.

For LGS, Units 1 and 2, we responded to NRC GL 88-01 by letters dated August 2, 1988, April 28, 1989, May 30, 1989, and September 11, 1989. Our responses took exception to requesting any TS changes on the basis that: 1) the ISI section of TS will be relocated to the Administrative Controls section of TS under the TS Improvement Program, and the NRC staff positions on IGSCC were incorporated as augmented inspection requirements in the ISI Program, and 2) the existing TS for leak detection are adequate to meet the intent of the NRC staff positions on leakage detection included in the GL.

NRC letter and associated Safety Evaluation dated March 6, 1990 provided the results of the NRC's review of our submittals responding to NRC GL 88-01. The NRC found our responses to NRC GL 88-01 acceptable with some exceptions, which included a rejection of our exceptions to requesting any TS changes regarding the ISI statement and leakage detection, and requested that we propose the appropriate changes to the TS for LGS, Units 1 and 2. Additionally, the March 6, 1990 NRC Safety Evaluation revised the NRC position on monitoring of leakage from once every four (4) hours (as stated in GL 88-01) to once every eight (8) hours. By letter dated June 8, 1990, we addressed the NRC exceptions identified in the March 6, 1990 NRC Safety Evaluation including a commitment to propose changes to the LGS, Units 1 and 2 TS to conform with the guidance in GL 88-01 concerning the statement on ISI, the limit of 2 gpm increase in unidentified leakage over a 24 hour period, and the NRC position that leakage be monitored every eight hours. By letter and associated Safety Evaluation dated October 22, 1990, the NRC found our June 8, 1990 response acceptable with one exception which is unrelated to this Change Request.

Implementing the guidance of NRC GL 88-01 at LGS, Units 1 and 2 will involve the proposed TS changes described below. All changes are reflected in the unit specific TS pages contained in Attachment 2.

1. Add new Surveillance Requirement 4.0.5.f to read "The Inservice Inspection (ISI) Program for piping identified in NRC Generic Letter 88-01 shall be performed in accordance with the staff positions on schedule, methods and personnel, and sample expansion included in the Generic Letter. Details for implementation of these requirements are included as augmented inspection requirements in the ISI Program." to require ISI Program conformance with the guidance provided in NRC GL 88-01. Additionally, a revision to Bases Section 4.0.5 is being proposed to indicate that such conformance is as approved in NRC Safety Evaluations dated March 6, 1990 and October 22, 1990.
2. Add new Limiting Condition for Operation 3.4.3.2.f to read "2 gpm increase in UNIDENTIFIED LEAKAGE over a 24-hour period." and corresponding Action statement 3.4.3.2.e to read "With any reactor coolant system leakage greater than the limit in f above, identify the source of leakage within 4 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours." to conform with the guidance provided in NRC GL 88-01. Additionally, a revision to Bases Section 3/4.4.3.2 is being proposed to address the new Limiting Condition for Operation and corresponding Action statement, and indicate that they conform with the guidance provided in NRC GL 88-01.
3. Revise Surveillance Requirement 4.4.3.2.1.b to read "Monitoring the drywell floor drain sump and drywell equipment drain tank flow rate at least once per eight (8) hours," to conform with the guidance provided in NRC GL 88-01. Additionally, a revision to Bases Section 3/4.4.3.2 is being proposed to indicate that this Surveillance Requirement conforms with the guidance provided in NRC GL 88-01 as modified by NRC Safety Evaluation dated March 6, 1990.

4. Revise Bases Section 3/4.4.8 on Structural Integrity to include the statement "Additionally, the Inservice Inspection Program conforms to the NRC staff positions identified in NRC Generic Letter 88-01, 'NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping,' as approved in NRC Safety Evaluation dated March 6, 1990 and October 22, 1990." TS Section 3.4.8 requires the structural integrity of ASME Code Class 1, 2, and 3 components be maintained in accordance with Surveillance Requirement 4.4.8 which strictly references TS Section 4.0.5. In light of the proposed change to TS Section 4.0.5 described in Item #1 above, this revision to Bases Section 3/4.4.8 is being proposed accordingly for completeness. No change is required to Surveillance Requirement 4.4.8 for the reasons stated above.

The proposed changes indicated by a vertical bar in the margin of Bases page B 3/4 4-4 for LGS, Unit 1, and Index page xix and Bases page B 3/4 4-3a for LGS, Unit 2 are solely the result of information overflow and movement due to the proposed changes described above.

#### Safety Assessment

The proposed TS changes conform with the guidance provided in NRC GL 88-01. The NRC positions described in the GL were developed as a result of extensive research into IGSCC problems. The GL states that if the NRC positions are implemented, adequate levels of piping integrity and reliability can be achieved. The proposed TS changes provide additional and more restrictive requirements regarding monitoring and responding to reactor coolant system leakage as well as examination of piping susceptible to IGSCC. This will ensure the structural integrity of components and piping by early detection of flaws. There are no changes to plant equipment, plant design, limiting safety system settings, or plant system operation. The proposed TS changes enhance recognition and evaluation of potential degradation before a more severe condition occurs.

#### Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the LGS TS, which reflect conformance with the guidance provided in NRC GL 88-01, do not constitute a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three standards set forth in 10CFR50.92 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 TS changes conform with the guidance provided in NRC GL 88-01. The proposed TS changes provide additional and more restrictive requirements in the TS regarding monitoring and responding to reactor coolant system leakage as well as examination of piping susceptible to IGSCC. This will ensure the structural integrity of components and piping by early detection of flaws. The NRC staff acknowledges in GL 88-01 that if the NRC positions are implemented, adequate levels of piping integrity and reliability can be achieved. The proposed TS changes do not

affect any plant hardware, plant design, plant systems, operating parameters or conditions that would cause a significant increase in the probability or consequences of any accident previously evaluated.

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

The proposed TS changes do not alter the design or function of any plant equipment, nor do they introduce any new operating scenarios, configurations, or failure modes that would 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.

The NRC acknowledges in GL 88-01 that if the NRC positions are implemented, adequate levels of piping integrity and reliability can be achieved. The proposed TS changes actually enhance recognition and evaluation of potential degradation before a more severe condition or accident occurs, and therefore, 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 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The requested changes do not involve a significant hazards consideration as discussed in the preceding section. The requested 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 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.