



PECO ENERGY

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

June 3, 1994

Docket No. 50-352
License No. NPF-39

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

Subject: Limerick Generating Station, Unit 1
Response to Request for Additional Information
for Technical Specifications Change Request 94-20-1

Gentlemen:

By letter dated May 6, 1994, PECO Energy Company submitted Limerick Generating Station (LGS), Unit 1, Technical Specifications (TS) Change Request 94-20-1 requesting that the Unit 1 TS be amended to permit an interim increase in the spent fuel storage capacity in the Unit 1 Spent Fuel Pool (SFP) from 2040 fuel assemblies to 2500 fuel assemblies. Subsequently, during a telephone conversation between PECO Energy and NRC representatives on June 1, 1994, the NRC requested that we provide additional information relative to the radiological control aspects of this proposed TS change. The NRC indicated that this information was necessary in order for the NRC to continue its review of TS Change Request 94-20-1. Therefore, the following information is being provided to support the NRC's review of this proposed TS Change Request. This additional information is being submitted under affirmation, and the required affidavit is enclosed.

- o The existing spent fuel in the LGS Unit 2 SFP will be transferred to the Unit 1 SFP for temporary storage in order to facilitate reracking of the Unit 2 SFP. To ensure that adequate storage capacity is available in the Unit 1 SFP to accommodate all of the spent fuel onsite at LGS (i.e., Unit 1, Unit 2, and Shoreham fuel) six (6) of the existing spent fuel storage racks will be relocated to the Unit 1 SFP. Transferring all of the spent fuel to the Unit 1 SFP will permit the Unit 2 reracking operation to be performed with the pool completely filled with water and fuel removed.
- o The spent fuel storage racks in the Unit 2 SFP that will be transferred to the Unit 1 SFP will first be rinsed with demineralized water. An underwater survey will then be performed on the racks to ascertain radiation/contamination levels. Hydroblazing will be considered, as necessary, if these levels are greater than 1R/hr.

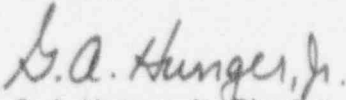
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- o The six (6) spent fuel storage racks that are being relocated from the Unit 2 SFP will be lifted from the water and transferred to the Unit 1 SFP. During this transfer, constant Health Physics coverage will be available. Continuous air sampling will be performed in order to monitor airborne radioactivity levels. We do not anticipate using respiratory protective devices for personnel, since the racks will be completely out of the water for only a short duration (i.e., **estimated 5 minutes**) and airborne radioactivity levels are not expected to increase. However, contingency arrangements will be in place to ensure that the racks do not dry out during transfer.
- o We do not anticipate using divers in either the Unit 2 or Unit 1 SFPs during the transfer of the six (6) spent fuel storage racks. However, if due to unforeseen circumstances a diver is necessary, the diving operation will be conducted in accordance with an existing plant diving procedure which incorporates the guidance delineated in Regulatory Guide 8.38, "Control Access to High and Very High Radiation Areas in Nuclear Power Plants," for the protection of divers.
- o The personnel exposure during the transfer of the six (6) racks will be maintained As Low As Reasonably Achievable (ALARA). We estimate personnel radiation exposure to be less than 1 man-rem.
- o Procedures will be in effect at the time of the rerack operation which contain appropriate radiological control hold points.

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

Very truly yours,



G. A. Hunger, Jr., Director
Licensing

Enclosure

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

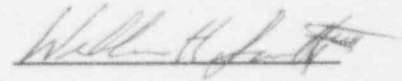
COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

W. H. Smith, III, 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 response to the Request for Additional Information regarding Technical Specifications Change Request No. 94-20-1 for Limerick Generating Station, Unit 1, Facility Operating License No. NPF-39, to permit an interim increase in the Unit 1 spent fuel storage capacity from 2040 fuel assemblies to 2500 fuel assemblies, 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.

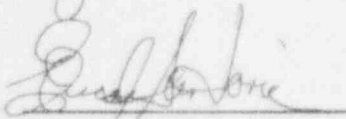


Vice President

Subscribed and sworn to

before me this 2nd day

of June 1994.



Notary Public

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