



PECO ENERGY

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

June 6, 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
Technical Specifications Change Request No. 94-15-1

Gentlemen:

PECO Energy Company is submitting Technical Specifications (TS) Change Request No. 94-15-1, in accordance with 10 CFR 50.90, requesting an amendment to the TS (Appendix A) of Operating License No. NPF-39 for Limerick Generating Station (LGS), Unit 1. This proposed TS change will remove the controls for a remote shutdown system control valve and delete the isolation signal for certain primary containment isolation valves from TS Tables 3.3.7.4-1 and 3.6.3-1 respectively, as a result of eliminating the steam condensing mode of the Residual Heat Removal (RHR) system. Information supporting this Change Request is contained in Attachment 1 to this letter, and the proposed replacement pages for the LGS Unit 1 TS are contained in Attachment 2.

We request that, if approved, the amendment to the LGS Unit 1 TS be effective immediately upon issuance.

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

Very truly yours,

G. A. Hunger, Jr.
Director
Licensing Section

CMI/clw

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC - w/ attachments
N. S. Perry, USNRC Senior Resident Inspector, LGS - w/attachments
R. R. Janati, Director, PA Bureau of Radiological Protection - w/attachments

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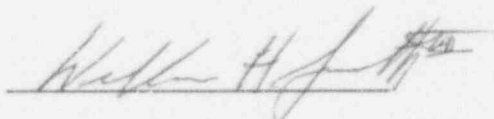
COMMONWEALTH OF PENNSYLVANIA :

: 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 Application for Amendment of Facility Operating License No. NPF-39 (Technical Specifications Change Request No. 94-15-1) to remove the controls for a remote shutdown system control valve and delete the isolation signal for certain primary containment isolation valves as a result of eliminating the steam condensing mode of the RHR system at Limerick Generating Station Unit 1, 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.

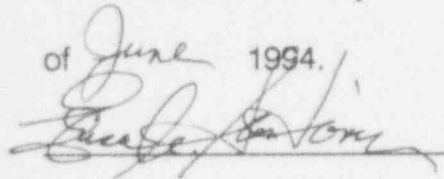


Vice President

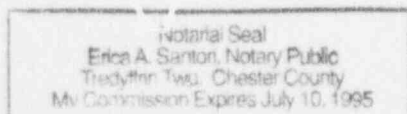
Subscribed and sworn to

before me this 6th day

of June 1994.



Notary Public



ATTACHMENT 1

LIMERICK GENERATING STATION

UNIT 1

Docket No. 50-352

License No. NPF-39

TECHNICAL SPECIFICATIONS CHANGE REQUEST

No. 94-15-1

"Remove the Controls For a Remote Shutdown System Control Valve and Delete the Isolation Signal for Certain Primary Containment Isolation Valves as a Result of Eliminating the Steam Condensing Mode of the Residual Heat Removal System."

Supporting Information for Changes - 4 pages

PECO Energy Company, Licensee under Facility Operating License No. NPF-39 for Limerick Generating Station (LGS), Unit 1, requests that the Technical Specifications (TS) contained in Appendix A to the Operating License be amended as proposed herein, to remove the controls for a remote shutdown system control valve and to delete the isolation signal for certain primary containment isolation valves from TS Tables 3.3.7.4-1 and 3.6.3-1 respectively, as a result of eliminating the steam condensing mode of the Residual Heat Removal (RHR) system. The proposed changes to the TS are indicated by the vertical bars in the margin of the TS pages 3/4 3-80 and 3/4 6-30. 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 amendment.

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 Residual Heat Removal (RHR) system steam condensing mode has never been used at Limerick Generating Station (LGS), Unit 1. The remainder of the steam condensing mode components of the RHR system have been removed from service at LGS, Unit 1, during the fifth refueling outage, in accordance with the provisions of Amendment No. 65 to Facility Operating License No. NPF-39. Based on the existing plant configuration, we propose the following Technical Specifications (TS) changes. Presently, valve HV-51-1F011A is locked closed with the electrical power removed. The valve's handswitch which is part of the remote shutdown panel (RSP) controls, does not perform any function and will be physically removed from the RSP since the TS surveillance requirements do not apply to this switch. Therefore, TS Table 3.3.7.4-1 will be revised to reflect the removal of the remote shutdown system control valve HV-51-1F011A. As a result of eliminating the steam condensing mode of the RHR system, the controls for Primary Containment Isolation Valves (PCIVs) HV-C-51-1F103A and HV-C-51-1F104B have been removed. Presently, these valves are locked closed in their safety-related position, with the electrical power removed, providing containment isolation. Since they no longer receive or require an isolation signal, (i.e., they can be manually operated), or require valve closure time, these requirements will be removed from TS Table 3.6.3-1. Therefore, we propose that TS Tables 3.3.7.4-1 and 3.6.3-1 be revised to reflect the removal of controls from the RSP for valve HV-51-1F011A and the deletion of isolation signal for PCIVs tag numbers HV-C-51-1F103A and HV-C-51-1F104B, as a result of eliminating the steam condensing mode of the RHR system at LGS, Unit 1.

Safety Assessment

The steam condensing mode of the Residual Heat Removal (RHR) system is a non-safety related function of RHR. However, the RHR components associated with this mode are safety-related for pressure and structural integrity. The proposed changes will not affect any components required to perform the safety-related function of the RHR system. Valve HV-51-1F011A is locked closed with the electrical power removed. The valve's handswitch which is part of the remote shutdown panel (RSP) controls, does not perform any function and will be physically removed from the RSP, since the TS surveillance requirements do not apply.

Primary Containment Isolation Valves (PCIVs) HV-C-51-1F103A and HV-C-51-1F104B are locked closed in their safety-related position with the electrical power removed. They no longer receive or require an isolation signal, or require valve closure time, since the steam condensing mode has been eliminated and they perform their safety-related function of providing containment isolation, as manual PCIVs.

Therefore, the proposed changes will not degrade the ability of the RHR system to respond to an accident.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the Limerick Generating Station (LGS), Unit 1, Technical Specifications (TS), which remove the controls for a remote shutdown system control valve and delete the isolation signal for certain primary containment isolation valves from TS Tables 3.3.7.4-1 and 3.6.3-1 respectively, as a result of eliminating the steam condensing mode of the Residual Heat Removal (RHR) system, do not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10CFR50.92 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 RHR system steam condensing mode is a non-safety related function of the RHR system and has been eliminated at Limerick Generating Station, Unit 1. These proposed changes will not affect any components required to perform the safety-related function of the RHR system.

The ability of the RHR system to respond to an accident will not be degraded by the proposed changes. Valve HV-51-1F011A is locked closed with the electrical power removed. The valve's handswitch which is part of the remote shutdown panel (RSP) controls, does not perform any function and will be physically removed from the RSP. The deletion of the isolation signal for valves HV-C-51-1F103A and HV-C-51-1F104B will not affect the ability of these valves to function as primary containment isolation valves (PCIVs), since they are locked closed already in their safety-related position, providing containment isolation as manual PCIVs. 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.

No new failure modes of RHR system are created by the proposed TS changes. All valves associated with the proposed changes are dedicated specifically for the RHR system steam condensing mode, and will not impact the operation of any components or piping required for other modes of operation of the RHR system. These valves are locked-closed in their safety-related position with the electrical power removed. 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 steam condensing mode is a non-safety related function of the RHR system and, therefore, is not addressed in the TS. The controls for remote shutdown system control valve HV-51-1F011A are not being used. Presently, the valve is locked closed with the electrical power removed and the valve's handswitch will be removed from the RSP, since it does not perform any function. The proposed changes will not impact the safe operation of LGS Unit 1. The deletion of the isolation signal for valves HV-C-51-1F103A and HV-C-51-1F104B will not affect the ability of these valves to function as primary containment isolation valves (PCIVs), since they are locked closed already in their safety-related position. 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 Limerick Generating Station (LGS), Unit 1 TS 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 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 the Nuclear Review Board have reviewed these proposed changes to the Limerick Generating Station (LGS), Unit 1 TS and have concluded that they do not involve an unreviewed safety question, and will not endanger the health and safety of the public.

ATTACHMENT 2

LIMERICK GENERATING STATION

UNIT 1

DOCKET NO. 50-352

LICENSE NO. NPF-39

TECHNICAL SPECIFICATIONS CHANGE REQUEST

NO. 94-15-1

LIST OF AFFECTED PAGES

UNIT 1

3/4 3-80

3/4 6-30