



PECO ENERGY

PECO Energy Company  
Nuclear Group Headquarters  
985 Chesterbrook Boulevard  
Wayne, PA 19087-5591

June 27, 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 No. 92-13-0  
Response to Request for Additional Information

Gentlemen:

This letter is being submitted in response to the NRC's request for additional information concerning Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) Change Request No. 92-13-0. PECO Energy Company submitted TS Change Request No. 92-13-0 by letter dated August 25, 1993, requesting that the TS (Appendix A) of Operating License Nos. NPF-39 and NPF-85 for LGS, Units 1 and 2, respectively, be amended to require that the Spray Pond spray piping network above the frost line be drained within (1) hour after being used when the ambient air temperature is below 40°F.

Subsequently, during a telephone conversation between PECO Energy and NRC representatives, the NRC requested that we provide additional information regarding the measures that will be taken to ensure that the Spray Pond spray piping networks are drained within one (1) hour after use when ambient air temperature drops below 40°F. Therefore, in response to the NRC request, the following administrative controls will be implemented to ensure that the Spray Pond spray piping network is drained within one (1) hour after use when ambient air temperature is below 40°F. This additional information is being submitted under affirmation, and the required affidavit is enclosed.

- o The plant procedure that governs the draining of the Spray Pond spray piping networks will be revised to include a "time period" in which personnel will be directed to drain the spray networks within one (1) hour after use, regardless of air temperature. The "time period" chosen for performing this activity will be November 1 through March 31, since draining spray networks within one (1) hour after use will preclude any potential for freezing. This "time period" was selected based on the daily average temperatures as recorded at the Philadelphia International Airport by the National Weather Bureau as indicated in the table below.

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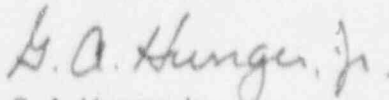
Date	Average Daily Temperature (ADT)
December 5 <sup>th</sup>	ADT Drops Below 40°F (39°F)
December 22 <sup>nd</sup>	ADT Drops Below Freezing (32°F)
February 14 <sup>th</sup>	ADT Rises Above Freezing (33°F)
March 11 <sup>th</sup>	ADT Rises Above 40°F (41°F)

In addition, ambient air temperature will be recorded each time the spray networks are secured. Therefore, should the ambient air temperature drop below 40°F during the remaining annual period (i.e., April 1 through October 31), the plant procedure will again direct personnel to drain the piping within one (1) hour.

- o In the event this procedural requirement is not followed, personnel will then be required to determine the ambient temperature that existed between the time the spray networks were in service and when they were drained in order to determine TS compliance.

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, Region I, USNRC (w/ enclosure)  
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ enclosure)  
R. R. Janati, Director, PA Bureau of Radiological Protection (w/ enclosure)

COMMONWEALTH OF PENNSYLVANIA

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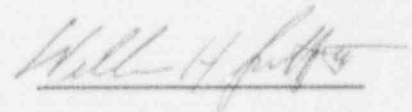
ss.

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 for Technical Specifications Change Request No. 92-13-0 for Limerick Generating Station, Units 1 and 2, Facility Operating License Nos. NPF-39 and NPF-85, to require that the Spray Pond spray piping networks above the frost line be drained within (1) hour after being used when the ambient air temperature is below 40°F, 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.

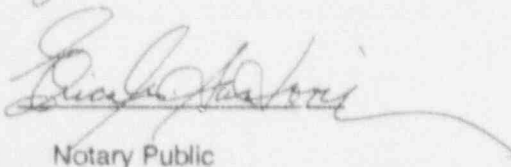


Vice President

Subscribed and sworn to

before me this <sup>27th</sup> day

of June 1994.



Notary Public

Notarial Seal  
Eric A. Santon, Notary Public  
Trenton Twp., Chester County  
PA 19380-1498 Expires July 10, 1995