



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

July 13, 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
 Proposed Change to the Technical Specifications Bases
 Regarding the Safety Analysis Assumptions for the
 Automatic Depressurization System

Gentlemen:

PECO Energy Company proposes a change to the Limerick Generating Station (LGS), Units 1 and 2 Technical Specifications (TS) Bases, Section 3/4.5.1, "EMERGENCY CORE COOLING SYSTEM - OPERATING," to accurately reflect the safety analysis assumptions for the Automatic Depressurization System (ADS). The Loss of Coolant Accident (LOCA) analysis assumes five operable ADS valves, instead of four valves, as the subject TS Bases currently states.

The proposed TS Bases change will correct the TS Bases to be consistent with the LOCA safety analysis performed by General Electric (GE), for LGS Units 1 and 2. This analysis has been presented in the GE topical report NEDC-32170P, Revision 1, "Limerick Generating Station Units 1 and 2 SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," dated June 1993, which has been accepted by the NRC for use at LGS Units 1 and 2, as documented in the NRC letter to PECO dated February 10, 1994.

LGS Units 1 and 2 currently operate with five ADS valves required to be operable. Accident analyses assume five ADS valves operable. Sensitivity to a single ADS valve failure is addressed in the GE topical report referenced above. This is not considered a normal operational mode as may be construed from the present wording of the subject TS Bases which states that the "safety analysis only takes credit for four valves". While it is still appropriate to permit one ADS valve to be out-of-service for up to fourteen days, it is not appropriate that the out-of-service time may be extended indefinitely, since five ADS valves are required to be operable according to the safety analysis.

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Therefore, we propose that TS Bases, Section 3/4.5.1 be corrected to remove any ambiguity in wording and accurately represent the ADS safety analysis assumptions.

Attachment 1 to this letter contains the proposed change to the LGS Units 1 and 2 TS Bases, Section 3/4.5.1.

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

Very truly yours,


G. A. Hunger, Jr.,
Director - Licensing

Attachment

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

ATTACHMENT 1

LIMERICK GENERATING STATION

UNITS 1 AND 2

**DOCKET NOS. 50-352
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**LICENSE NOS. NPF-39
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PROPOSED TECHNICAL SPECIFICATIONS BASES CHANGE

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