



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 78 AND 39 TO FACILITY OPERATING
LICENSE NOS. NPF-39 AND NPF-85
PHILADELPHIA ELECTRIC COMPANY
LIMERICK GENERATING STATION, UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated March 28, 1994, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested change modifies the requirements for performing a channel functional test of electrical protective assemblies (EPAs) that are currently specified with a 6-month surveillance interval. Guidance on this proposed change was provided to all boiling-water reactor (BWR) licensees by Generic Letter 91-09, dated June 27, 1991.

2.0 EVALUATION

The licensee has proposed to modify the 6-month surveillance intervals for performing channel functional tests of EPAs as specified in Technical Specification (TS) 4.8.4.3.a to state that they are to be performed "each time the plant is in COLD SHUTDOWN for a period of more than 24 hours, unless performed in the previous 6 months." This change is consistent with the guidance provided in Generic Letter 91-09.

The Niagara Mohawk Power Corporation provided an analysis in a proposal submitted on December 15, 1988, that calculated the safety risks and benefits of this TS change. The U.S. Nuclear Regulatory Commission (NRC) staff reviewed and concurred with the conclusions of this analysis that this TS change will produce a net safety benefit. Because the EPAs for all BWRs are primarily the same, the staff finds that this analysis applies generically to all BWRs. In addition, it is the staff's qualitative judgement that the proposed increase in the surveillance interval is not safety significant because of the diverse protection that exists, the number of failures that have to occur to have an adverse impact on safety, and the potential for detecting a degraded condition of the RPS through on-line testing. Therefore, the staff finds that the licensee's proposed TS change is acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (59 FR 27062). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: September 8, 1994