



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 76 AND 37 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 April 27, 1994, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS). The requested changes would delete TS Surveillance Requirement (SR) 4.4.1.1.1, which requires that the reactor recirculation pump discharge valve be demonstrated operable by performing a full-stroke test of the valve prior to reactor thermal power exceeding 25 percent of rated reactor thermal power, unless the cycling has been performed within the previous 31 days.

2.0 EVALUATION

Currently, LGS TS SR 4.4.1.1.1 requires that each reactor recirculation system pump discharge valve be demonstrated operable by cycling each valve through at least one complete cycle of full travel during each startup prior to reactor thermal power exceeding 25 percent of the rated reactor thermal power, unless the cycling has been done within 31 days.

The intent of TS SR 4.4.1.1.1 is to satisfy an Emergency Core Cooling System (ECCS) operability requirement for Boiling Water Reactors (BWR) where the reactor recirculation system piping serves as the injection flowpath to the reactor pressure vessel for the Low Pressure Coolant Injection (LPCI) system. At LGS, each LPCI subsystem has its own independent flowpath to the reactor pressure vessel, and does not rely on the reactor recirculation system piping for injecting to the reactor pressure vessel. The LPCI subsystems have dedicated injection nozzles on the reactor vessel which provide the required independent injection flowpath to the reactor vessel. Furthermore, the licensee has stated that the reactor recirculation system pump discharge valves are normally kept open during reactor power operation. These valves are classified as passive safety-related components.

Since the LPCI system at LGS does not rely on the reactor recirculation system piping to perform its ECCS function, and it has an independent flowpath for

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injecting water to reactor pressure vessel, the deletion of TS SR 4.4.1.1.1 does not affect the safe operation of the LGS units. The reactor recirculation system will continue to maintain reactor pressure boundary integrity and to provide sufficient flow through the reactor core to remove heat generated from the fuel. Therefore, the staff has determined that deleting SR 4.4.1.1.1 from TS 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 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 29628). 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 7, 1994