

PHILADELPHIA ELECTRIC COMPANY

10 CFR 50.90

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

April 30, 1991

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20545

Subject: Limerick Generating Station, Units 1 and 2
Technical Specifications Change Request to
Incorporate the Recommendations of NRC Generic
Letter 90-09, "Alternate Requirements for Snubber
Visual Inspection Intervals and Corrective Actions"

Gentlemen:

This letter submits Technical Specifications (TS) Change Request No. 90-18-0, in accordance with 10 CFR 50.90, requesting amendments to the TS (Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS) Units 1 and 2, respectively. This Change Request is being submitted to incorporate into LGS TS the recommendations specified in NRC Generic Letter (GL) 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

This submittal requests a change to the LGS Units 1 and 2 TS in order to implement the alternate TS surveillance requirement for visual inspection of snubbers as specified in NRC GL 90-09. Information supporting this Change Request is provided in Attachment 1 of this letter. The proposed replacement pages for the LGS Units 1 and 2 TS are contained in Attachment 2. All proposed changes to the text have been identified with a revision bar in the right margin.

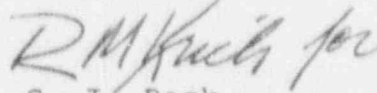
We request the approved changes proposed herein be effective upon issuance of the TS amendments.

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PDR ADOCK 05000352
P PDR

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "G. J. Beck", written over the typed name.

G. J. Beck
Manager
Licensing Section
Nuclear Engineering and Services

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/
attachments)
T. J. Kenny, USNRC Senior Resident Inspector, LGS (w/
attachments)
T. M. Gerusky, Director, PA Bureau of Radiation Protection
(w/ attachments)

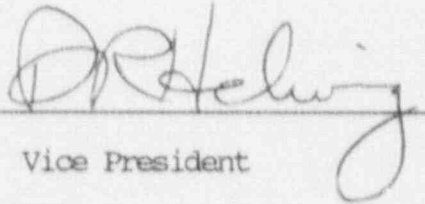
COMMONWEALTH OF PENNSYLVANIA :

: SS.

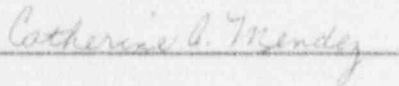
COUNTY OF CHESTER :

D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating License Nos. NPF-39 and NPF-85 (Technical Specifications Change Request No. 90-18-0) to incorporate the recommendations specified in NRC Generic Letter 90-01, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions," and knows that 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 30th day
of April 1991.



Notary Public

NOTARIAL SEAL
CATHERINE A. MENDOZ, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires Sept. 4, 1993

ATTACHMENT 1

LIMERICK GENERATING STATION
UNITS 1 AND 2

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

No. 90-18-0

"Incorporate the Recommendations of
NRC Generic Letter 90-09"

Supporting Information for Changes - 4 Pages

Philadelphia Electric Company (PECo), Licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, requests that the Technical Specifications (TS) contained in Appendix A of Operating License Nos. NPF-39 and NPF-85 be amended as proposed herein to incorporate the recommendations specified in NRC Generic Letter (GL) 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions." GL 90-09 recommends that licensees implement the alternate TS surveillance requirement for visual inspections of snubbers as specified in the GL. Therefore, we propose to revise TS Surveillance Requirement (SR) 4.7.4b and Bases 3/4.7.4 in accordance with the recommendations of GL 90-01.

We request that the approved changes proposed herein be effective upon issuance of the TS amendments.

This Change Request provides a discussion and description of the proposed TS change, a safety assessment of the proposed TS change, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

Discussion and Description of the Proposed Change

NRC GL No. 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990, encourages licensees to implement the alternate TS surveillance requirement for visual inspection of snubbers as specified in the GL. As stated in the GL, the NRC developed an alternate schedule for visual inspection of snubbers that maintains the same snubber operability confidence level as the existing inspection schedule and will generally allow the licensee to perform visual inspections and corrective actions during plant outages. We have reviewed this NRC alternate schedule and have chosen to request the recommended changes to the LGS Units 1 and 2 TS.

Existing TS requirements for the visual inspection of snubbers are based on an eighteen (18) month refueling cycle and stipulate that the schedule for visual inspection be determined by the number of inoperable snubbers found during the previous visual inspection. The existing process for determining the number of snubber visual inspections is based solely on the number of inoperable snubbers found during the previous visual inspection, regardless of the size of the snubber population.

However, the alternate inspection schedule proposed in GL 90-09 is based on a twenty-four (24) month refueling cycle and the number of inoperable snubbers found during the previous inspection in proportion to the sizes of the snubber population or snubber categories. Furthermore, the NRC indicated that since this line-item TS improvement will reduce future occupational radiation exposure and is highly cost effective, the alternate inspection schedule proposed in GL 90-09 is consistent with the NRC's policy statement on TS improvements. Therefore, the proposed changes to the LGS Units 1 and 2 TS are requested in order to realize the benefits identified in GL 90-09.

Safety Assessment

As previously discussed, the proposed TS changes are in accordance with the recommendations specified in GL 90-09 and are in accordance with the NRC's policy on TS improvements.

The performance of visual inspections of snubbers is a separate process that complements the snubber functional testing program and provides additional confidence of snubber operability. The alternate schedule developed by the NRC is based on 1) the number of inoperable snubbers found during the previous inspection, 2) the total population or category size for each snubber type, and 3) the previous inspection interval. Furthermore, the alternate inspection interval is compatible with a twenty-four (24) month refueling cycle. The NRC has evaluated this alternate schedule and concluded that it maintains the same snubber operability confidence level as that currently provided in the TS.

We agree with the NRC's conclusion that this alternate schedule will maintain the same confidence level, and therefore will not impact the determination or assurance of snubber operability. This proposed change does not involve a physical change to any plant equipment and will not result in an increased probability of a malfunction of equipment that is affected by snubber performance.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the LGS Units 1 and 2 TS for implementing the recommendations provided in GL 90-09 do not constitute a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Implementing the recommendations as specified in GL 90-09 will not introduce any new failure mode and will not alter any assumptions previously made in evaluating the consequences of an accident since the same confidence level exists for ensuring snubber operability. The proposed changes do not affect limiting safety system setting or operating parameters, and do not modify or add any accident initiating events or parameters. Therefore, the proposed change does not cause an increase in the probability or consequences of an accident previously evaluated.

- 2) The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes to the LGS Unit 1 and 2 TS for implementing the recommendations specified in GL 90-09 do not involve any physical alterations to plant equipment, changes to setpoints or operating parameters, nor does it involve any potential accident initiating event. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) The proposed change does not involve a significant reduction in the margin of safety.

The proposed changes maintains the same confidence level as that currently provided by the TS for determining snubber operability. Accordingly, the existing margin of safety will be maintained. Therefore, the proposed change does 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 since the requested changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes does 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 Nuclear Review Board have reviewed the proposed changes to the LGS Units 1 and 2 TS and have concluded that the changes do not involve an unreviewed safety question, or a significant hazards consideration, and will not endanger the health and safety of the public.

ATTACHMENT 2

LIMERICK GENERATING STATION
UNITS 1 AND 2

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

No. 90-18-0

List of Affected Page Changes

Unit 1

3/4 7-11
3/4 7-11a (new page)
3/4 7-11b (new page)
3/4 7-12
B 3/4 7-2

Unit 2

3/4 7-11
3/4 7-11a (new page)
3/4 7-11b (new page)
3/4 7-12
B 3/4 7-2