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> Februar, 15, 1995 Docket Nos. 50-352 50-353 License Nos. NPF-39 NPF-85

TS 6.9.1.8 U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

PECO ENERGY

Subject: Limerick Generating Station, Units 1 and 2

- Annual Effluent Release Report No. 20, January 1, 1994 through December 31, 1994
- Annual Tower No. 1 Joint Frequency Distributions of Wind Direction and Speed by Atmospheric Stability Class Report No. 10 for 1994.

Gentlemen:

Enclosed is the Annual Effluent Release Report No. 20 for Limerick Generating Station (LGS), Units 1 and 2, for the period January 1, 1994 through December 31, 1994.

In addition, the Annual Tower No. 1 Joint Frequency Distributions of Wind Direction and Speed by Atmospheric Stability Class Report No. 10 is enclosed. This report provides meteorological data for LGS for the calendar year 1994.

These reports are being submitted in accordance with the LGS Technical Specification Section 6.9.1.8. and 10CFR50.36(a).

Very truly yours,

FJH/smh Enclosures

cc: T. T. Martin, Administrator, Region I, USNRC (w/enclosure) Neil Perry, USNRC Senior Resident Inspector, LGS (w/enclosure)

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cc: Sr. V.P. Nuclear Sr. V.P. Legal V.P. LGS V.P. Nuclear Services Gen. Mgr. NQA Plant Mgr. - LGS Engr. Reg. Support - LGS Correspondence Release Point Document Services (w/o enclosures)

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bcc: D. E. Ney, PADER Chief Region III, USEPA INPO John Decker, GE Dir. Bureau Rad. Protection P. D. Krippner, ANI PADER BRP inspector LGS Effluent Physicist Chairman NRB Consultant NRB Executive Asst. NRB

SUMMARY OF CHANGES

ODCM Revision 12

- The Lower Limit of Detection (LLD) equation on pages 26 and 27 was changed to add "elapsed time period expressions" to accurately account for short half lived radioactive isotopes. A value of 2.71 was also added to the numerator of the LLd equation to achieve a more accurate value when determining the LLD for short sample count times.
- 2) Satellite Met Tower on figure I3.1-1 (pg. 19) was deleted to coincide with NCR 93-0361 (A/R A0770503 Eval 2.)
- 3) A reference section and purpose were added.
- 4) New REMP maps (figure B1-B4) were added.

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- 5) Surveillance requirements 3.2.4-2 (pg.29) and 3.3.5-2 (pg. 41) were deleted because they were redundant with surveillance requirements 3.2.4-1 and 3.3.5-1.
- 7) The word "OPERABLE" was replaced by "IN SERVICE" in control 3.2.4 and 3.3.5 in order to more accurately define the intent of the control.

ODCM Revision 13

1) Hot Maintenance Shop Gaseous Effluent diagram was revised to coincide with NCR 94-00004 and current system configuration.

ODCM Revision 14

- The LGS annual average meterological dispersion (Chi/Q) value was added for evaluation of the site boundary dose rate due to a Noble Gas effluent release.
- An LLD equation was added for grab sample analysis and to include entrained Noble Gases in the liquid effluent LLD specification.

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ODCM Revision 15

- Excessive conservativism in liquid effluent setpoint calculations and in the frequency at which the setpoints were calculated were reduced.
- 2) Excessive conservatism in gaseous effluent setpoint calculations was reduced. The new HIGH setpoint basis reflects ODCM compliance. The new HIGH-HIGH setpoint basis was changed to reflect each release point being the primary contributor to the Unusual Event Emergency Action Level which is based on the Site Boundary dose rate value of 0.114 mrem/hr.
- 3) Chemistry sampling and setpoint change requirements for Primary Containment requirements were deleted. LGS is a continuous release BWR. Purging primary containmnet is a normal plant evolution which provides a batch contribution to the continuous release process.
- REMP maps and Tableswere revised/updated to correspond to current sample locations.
- 5) Minor typographical errors were fixed.

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