

PHILADELPHIA ELECTRIC COMPANY  
NUCLEAR GROUP HEADQUARTERS  
955-65 CHESTERBROOK BLVD.  
WAYNE, PA 19087-5691  
(215) 640-6000

March 3, 1992

NUCLEAR ENGINEERING &amp; SERVICES DEPARTMENT

Docket Nos. 50-352  
50-353License Nos. NPF-39  
NPF-85

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

Subject: Limerick Generating Station, Units 1 and 2  
Technical Specifications Change Request

Gentlemen:

Philadelphia Electric Company (PECO) is submitting Technical Specifications (TS) Change Request No. 91-04-0, 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 submittal requests that the snubber functional testing TS Surveillance Requirements (SRs) and pertinent Bases be revised to incorporate the most recent recommendations contained in the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) standard for snubber testing, ASME/ANSI OM-1990 Addenda to ASME/ANSI OM-1987, Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)." Specifically, we are requesting to 1) revise the 10% functional testing sampling plan (SR 4.7.4.e.1), 2) delete the 55 plan (SR 4.7.4.e.3), 3) incorporate the concept of "Failure Mode Grouping," and 4) remove the "reject" line from the 37 plan (SR 4.7.4.e.2). These same changes have been previously approved by the NRC by letter dated July 13, 1990, for Nine Mile Point Nuclear Station, Unit 2. In addition, we request that the snubber functional testing interval be changed from 18 months to 24 months ( $\pm 25\%$ ) to accommodate a 24 month refueling cycle.

We request that, if approved, the Amendments to the LGS, Units 1 and 2, TS be effective upon issuance.

9203100125 920303  
PDR ADDCK 05000352  
PDR

Adol  
1/11

In addition, LGS Unit 1 is scheduled to begin the fourth refueling outage on March 21, 1992, during which snubber functional testing will be conducted. Currently, we have selected to perform snubber testing in accordance with the present TS "55 plan." However, if this proposed TS change is approved and we are still performing snubber functional testing, we will then implement the "37 plan."

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

Very truly yours,



G. J. Beck, Manager  
Licensing Section

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 Radiological Protection  
w/attachments

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF CHESTER :

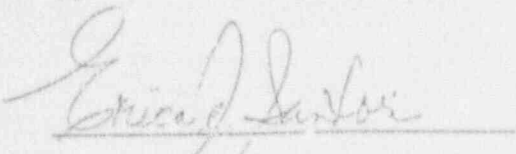
G. M. Leitch, being first duly sworn, deposes and says:

That he is Vice President, Limerick Generating Station of Philadelphia Electric Company, the Applicant herein; that he has read the enclosed Technical Specifications Change Request No. 91-04-0 for Limerick Generating Station, Units 1 and 2, Facility Operating License Nos. NPF-39 and NPF-85 and knows 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 *2nd* day  
of *March* 1992.



Notary Public

Notarial Seal  
Erica A. Sanborn, Notary Public  
Tredyffrin Twp., Chester County  
My Commission Expires July 10, 1995