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MAY 25 1984

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JOHN S. KEMPER
VICE-PRESIDENT
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Mr. A. Schwencer, Chief Docket Nos.:
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject:

Limerick Generating Station, Units 1&2 Additional Information for Auxiliary Systems Branch (ASB) Regarding SER Proposed Licensing Conditions 8, 9, 10 and 12.

References:

- Telecon between J. H. Arhar (PECO) and J. Ridgely (NRC/ASB) on 5/11/84
- 2. Letter, E. J. Bradley to H. R. Denton, 5/18/84 (Amendment No. 65 to License Application).

File:

GOVT 1-1 (NRC)

Dear Mr. Schwencer:

We are pleased to offer the following additional information, discussed in the reference telecon, in support of the resolution of the subject proposed license conditions.

SER proposed license conditions 8, 9, 10 and 12 require two common conditions for operation of shared systems (i.e., systems that are common to the two reactor units) during the interim period between Unit 1 operation and Unit 2 construction. These shared systems include the emergency service water (ESW) system (license condition #8), residual heat removal service water (RHRSW) system (license condition #9), control structure chilled water (CSCW) system (license condition #10), and control room and control structure ventilation (CRCSV) systems (license condition #12). The two common conditions for operation of shared systems include onsite stand-by power and security conditions.

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Onsite Stand-by Power

The subject license conditions require that each shared system be powered from only the Unit 1 diesel generators during Unit 1 Operation/Unit 2 construction. The following system design aspects provide our proposed compliance with regard to this condition.

- 1. During two unit operation, ESW pumps A and B are powered from Unit 1 diesels A and B, while pumps C and D are powered from Unit 2 diesels C and D. However, during Unit 1 operation/Unit 2 construction, pumps C and D will be powered from Unit 1 diesels C and D (FSAR Section 9.2.2.6).
- During two unit operation, RHRSW pumps A and B are powered from Unit 1 diesels A and B, while pumps C and D are powered from Unit 2 diesels A and B. However, during Unit 1 operation/Unit 2 construction, pumps C and D will be powered from offsite power sources only (FSAR Section 9.2.3.2). Because each RHRSW pump provides 100% heat removal capability, complete redundancy is provided even in the unlikely event of total loss of offsite power.
- 3. During both Unit 1 operation/Unit 2 construction and two unit operation schemes, safety related components of the CRCSV and CSCW systems are powered from only Unit 1 diesels C and D.

Security

The subject license conditions require that components and related piping of each shared system be included as part of the Unit 1 security boundary during Unit 1 operation/Unit 2 construction. The Unit 1 security boundary is defined in the Limerick Physical Security Plan. The following system design aspects provide our proposed compliance with regard to this condition.

1. During Unit 1 operation/Unit 2 construction, ESW and RHRSW supplies and returns to Unit 2 enclosures are valved or flanged off. ESW and RHRSW pumps are located within the Unit 1 security boundary. ESW and RHRSW piping and isolation valves that are located outside of the Unit 1 security boundary enclosures are protected by special security measures as described in Chapter 10 of the Physical Security Plan. Chapter 10 was transmitted in reference (2).

- 2. CRCSV system components are located within the Unit 1 security boundary. Related system HVAC ducts which penetrate the Unit 1 security boundary are protected by special security measures as described in Chapter 10 of the Physical Security Plan.
- 3. All CSCW system pumps, related piping, and isolation valves are located within the Unit 1 security boundary.

Should any additional information be required, please do not hesitate to contact us.

Sincerely,

John King

JHA/gra/0514841105

cc: See Attached Service List

cc: Judge Lawrence Brenner Judge Richard F. Cole Troy B. Conner, Jr., Esq. Ann P. Hodgdon, Esq. Mr. Frank R. Romano Mr. Robert L. Anthony Charles W. Elliot, Esq. Zori G. Ferkin, Esq. Mr. Thomas Gerusky Director, Penna. Emergency Management Agency Angus R. Love, Esq. David Wersan, Esq. Robert J. Sugarman, Esq. Spence W. Perry, Esq. Jay M. Gutierrez, Esq. Atomic Safety & Licensing Appeal Board Atomic Safety & Licensing Board Panel Docket & Service Section Martha W. Bush, Esq. Mr. James Wiggins Mr. Timothy R. S. Campbell Ms. Phyllis Zitzer

Judge Peter A. Morris