



**PECO ENERGY**

PECO Energy Company  
Nuclear Group Headquarters  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

September 14, 1995

Docket Nos. 50-352  
50-353

License Nos. NPF-39  
NPF-85

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

Subject: Limerick Generating Station, Units 1 and 2  
Technical Specifications Change Request No. 95-15-0  
Removal of Secondary Containment Isolation Valve Tables

Gentlemen:

PECO Energy Company (PECO) is submitting Technical Specifications (TS) Change Request No. 95-15-0, in accordance with 10 CFR 50.90, requesting a change to TS (i.e., Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2.

The purpose of the proposed TS changes is to remove the Reactor Enclosure and Refueling Area Secondary Containment Isolation Valve Tables 3.6.5.2.1-1 and 3.6.5.2.2-1 from TS in accordance with NRC Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications."

Information supporting this TS Change Request is contained in Attachment 1 to this letter, and copies of the marked-up TS pages for the LGS, Units 1 and 2, TS are contained in Attachment 2. The TS change information is being submitted under affirmation, and the required affidavit is enclosed.

We request that if approved, the TS Change be issued by January 26, 1996, and become effective within 30 days of issuance.

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

Very truly yours,

*G. A. Hunger, Jr.*

G. A. Hunger, Jr.,  
Director-Licensing

Enclosure, Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/enclosure, attachments)  
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/enclosure, attachments)  
R. R. Janati, PA Bureau of Radiation Protection (w/enclosure, attachments)

9509220064 950914  
PDR ADOCK 05000352  
P PDR

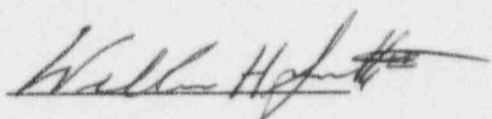
ADD 11

COMMONWEALTH OF PENNSYLVANIA :

: ss.

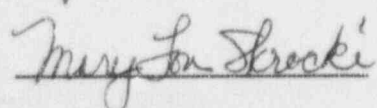
COUNTY OF CHESTER :

W. H. Smith, III, being first duly sworn, deposes and says: That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the enclosed Technical Specifications Change Request No. 95-15-0 "Removal of Secondary Containment Isolation Valve Tables," for Limerick Generating Station, Unit 1 and Unit 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 14<sup>th</sup> day  
of September 1995.



Notary Public

Notarial Seal  
Mary Lou Skrocki, Notary Public  
Tredyffrin Twp., Chester County  
My Commission Expires May 17, 1999

Member, Pennsylvania Association of Notaries

ATTACHMENT 1

LIMERICK GENERATING STATION

UNITS 1 AND 2

Docket Nos.

50-352

50-353

License Nos.

NPF-39

NPF-85

"Removal of Secondary Containment Isolation Valve Tables  
from Technical Specifications"

Information Supporting Changes - 2 pages

## DISCUSSION AND DESCRIPTION OF THE PROPOSED CHANGES

PECO Energy Company (PECO Energy) is requesting Technical Specifications (TS) changes which will remove the Reactor Enclosure and Refueling Area Secondary Containment Isolation Valve Tables (3.6.5.2.1-1 and 3.6.5.2.2-1) from TS in accordance with NRC Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications."

The valves and their associated isolation signals are currently identified in the LGS Updated Final Safety Analysis Report (UFSAR) and will also be contained in a plant procedure. Both the UFSAR and the plant procedure are subject to the change control provisions described in the Administrative Controls Section of TS. Therefore, removal of the tables from TS will permit administrative control of future changes to the tables without processing a licensing amendment.

## TS SAFETY ASSESSMENT

Generic Letter 91-08 provides guidance to remove component lists from the Technical Specifications. This is acceptable provided that TS requirements are stated in general terms that describe the types of components to which the requirements apply, and because the removal of component lists do not alter existing TS requirements or those components to which they apply. In addition, the removed lists must be included in a plant procedure that is subject to the change control provisions for plant procedures in the Administrative Controls Section of TS, and it is permissible to reference the location of removed lists in the TS Bases Section.

LGS TS Sections 3.6.5.2.1 "Reactor Enclosure Secondary Containment Automatic Isolation Valves," and 3.6.5.2.2 "Refueling Area Secondary Containment Automatic Isolation Valves," provide a description of the components to which the TS requirement applies. The valves are contained in TS tables 3.6.5.2.1-1, and 3.6.5.2.2-1, are currently contained in the UFSAR and will be incorporated into a plant procedure. Both documents are subject to the change control provisions of the Administrative Controls Section of TS, and the location of the removed tables will be described in LGS TS Bases Section 3/4.6.5, "Secondary Containment." Therefore, the proposed changes are in accordance with the guidance provided by NRC GL 91-08.

## INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

We have concluded that the proposed changes to the Limerick Generating Station (LGS) Unit 1 and Unit 2 TS, which will remove the Reactor Enclosure and Refueling Area Secondary Containment Isolation Valve Tables (3.6.5.2.1-1 and 3.6.5.2.2-1) from TS in accordance with NRC GL 91-08, do not involve 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 TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes will remove component tables from TS. The component lists will be retained in licensee controlled documents (UFSAR and a plant procedure) which will be maintained under the requirements of TS Administrative Controls Section 6.0 and the provisions of 10CFR50.59. Since any changes to licensee controlled documents are required to be evaluated per 10CFR50.59, no increase (significant or insignificant) in the probability or consequences of an accident previously evaluated will be allowed.

In addition, these proposed changes will not affect any equipment important to safety, in structure or operation. These changes will not alter operation of process variables, structures, systems, or components as described in the safety analysis and licensing basis. The changes will not increase the probability or consequences of occurrence of a malfunction of equipment important to safety previously evaluated in the SAR.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes will not alter the plant configuration or change the methods governing normal plant operation. The changes will not impose different operating requirements and adequate control of information will be retained. The changes will not alter assumptions made in the safety analysis and licensing basis. Since the proposed changes cannot cause an accident, and the plant response to the design basis events is unchanged, the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

The proposed changes to remove the component tables from TS have been performed under the guidance of NRC GL 91-08. The component lists will be retained in licensee controlled documents (UFSAR and a plant procedure) which will be maintained under the requirements of TS Administrative Controls Section 6.0 and the provisions of 10CFR50.59. These changes will not reduce the margin of safety since they have no impact on any safety analysis assumptions. Since any future changes to the removed tables will be evaluated under the requirements of 10CFR50.59, no reduction (significant or insignificant) in a margin of safety will be allowed. Therefore, the proposed TS changes do not involve a significant reduction in a margin of safety.

#### INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

An Environmental Assessment is not required for the Technical Specifications changes proposed by this request because the requested changes to the LGS, Units 1 and 2, TS conform to the criteria for "actions eligible for categorical exclusion," as specified in 10 CFR 51.22(c)(9). The requested TS changes will have no impact on the environment. The proposed TS changes do 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 effluent that may be released offsite. In addition, the proposed TS changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

#### CONCLUSION

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the LGS Units 1 and 2 TS, and have concluded that the changes do not involve an unreviewed safety question, and will not endanger the health and safety of the public.