



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 20, 1992

Docket Nos. 50-352
and 50-353

Mr. George J. Beck
Manager - Licensing, MC 5-2A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: RELIEF REQUEST GPRR-4 TO FIRST TEN-YEAR INTERVAL PUMP
AND VALVE INSERVICE TESTING (IST) PROGRAM FOR LIMERICK
GENERATING STATION, UNITS 1 AND 2 (TAC NOS. MB2094 AND
MB2095)

Your letter of October 31, 1991, submitted Inservice Testing (IST) Program Relief Request GPRR-4 for the first 10-year interval which commenced February 1, 1986, and January 8, 1990, for the Limerick Generating Station (LGS), Units 1 and 2, respectively. Specifically, you requested relief from the ASME Boiler and Pressure Vessel (B&PV) Code, Section XI, Paragraph IWP-3100 requirement that instrumentation to measure pump inlet pressure have an accuracy of $\pm 2\%$ of full scale and requested NRC approval to use the primary containment suppression pool level instrumentation to determine pump inlet pressure.

This relief request applies to the Residual Heat Removal, Core Spray and the Safeguard Piping Fill systems. You propose to use suppression pool level instrumentation to measure pump inlet pressure because existing installed pump inlet pressure instrumentation cannot meet the full-scale range and accuracy requirements of Section XI, of the ASME Code. Relief Request GPRR-4 provides justification for the use of suppression pool level instrumentation and demonstrates that the proposal can meet the accuracy requirements of the Code.

We have determined pursuant to 10 CFR 50.55a(a)(3)(ii), for the items for which relief is requested that compliance with the specified requirements would result in hardship and unusual difficulty without a compensating increase in the level of quality and safety. We have also determined that the alternative method you propose to use to measure pump inlet pressure will provide an acceptable level of quality and safety.

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The staff has also determined that the granting of the relief is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Accordingly, relief from certain requirements of Section XI of the ASME Code is hereby granted, as described in the enclosed Safety Evaluation.

Sincerely,

/s/

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - 1/11
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:
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as modified

Mr. George J. Beck

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February 20, 1992

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Sincerely,

Charles L. Miller

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:
See next page

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Philadelphia Electric Company

Limerick Generating Station,
Units 1 & 2

cc:

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