



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 103 AND 67 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated January 27, 1995, as supplemented October 10, 1995, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested changes would eliminate the operability requirements associated with the containment isolation function of certain valves installed in the Drywell Chilled Water System (DCWS). The supplemental letter made editorial corrections to Table 3.6.3-1, for Unit 1 only, and did not change the initial proposed no significant hazards consideration determination and was not outside of the scope of the Federal Register notice.

2.0 EVALUATION

The DCWS in each unit supplies chilled water at 50°F temperature for equipment cooling inside the primary containment. This equipment includes unit air coolers' coils, the sump drain cooling coil, recirculation pump motor air coolers, drywell equipment drain sump cooling coil, sample coolers and vacuum pump seal cooler. The DCWS also supplies cooling to other equipment outside the drywell. The DCWS has a backup (non-chilled) water supply from the Reactor Enclosure Cooling Water (RECW) System. Neither the DCWS or RECW System is safety-grade. In the event of an accident, containment cooling is provided by the Engineered Safety Feature, containment heat removal systems. The DCWS/RECW containment penetrations are arranged as shown in the enclosed figure.

The valves identified as "224" and "225" in the attached drawing (four valves per unit) are classified as containment isolation valves and have maximum allowable closure time limits specified in the Technical Specifications for plant operations in Modes 1, 2 and 3. The licensee proposes to remove the automatic isolation relays for these valves and to lock the valve operator circuit breakers in the open position. The relays to be removed are devices which, when deenergized by an automatic isolation signal, cause the valve operators to close the valves if they are open. These modifications, along with administrative controls, will preclude the valves being open during Modes 1, 2 and 3. Thus the automatic closure feature will be unnecessary. The

valves will remain classified as isolation valves since they will still have a passive isolation function. The deenergization of the valve operator power source makes each valve a passive "sealed-closed barrier" as defined in Standard Review Plan Section 6.2.4, paragraph II.f. This eliminates the need for operability and surveillance testing of the automatic closure feature. The effect of locking open the valve operator circuit breakers removes the RECW system as a backup water supply. This is acceptable since both systems are non-safety. However, all aspects of Appendix J leak testing requirements of these two valves will remain in effect.

The licensee's modifications will eliminate the "active safety function to close" feature of the "224" and "225" valves. This feature can be eliminated because the RECW backup water supply to the DCWS system is not a safety requirement. As a result of eliminating the active isolation feature, the TS operability and surveillance requirements associated with automatic isolation are unnecessary. Therefore, based on the staff's review, the licensee's modifications are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 20524). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

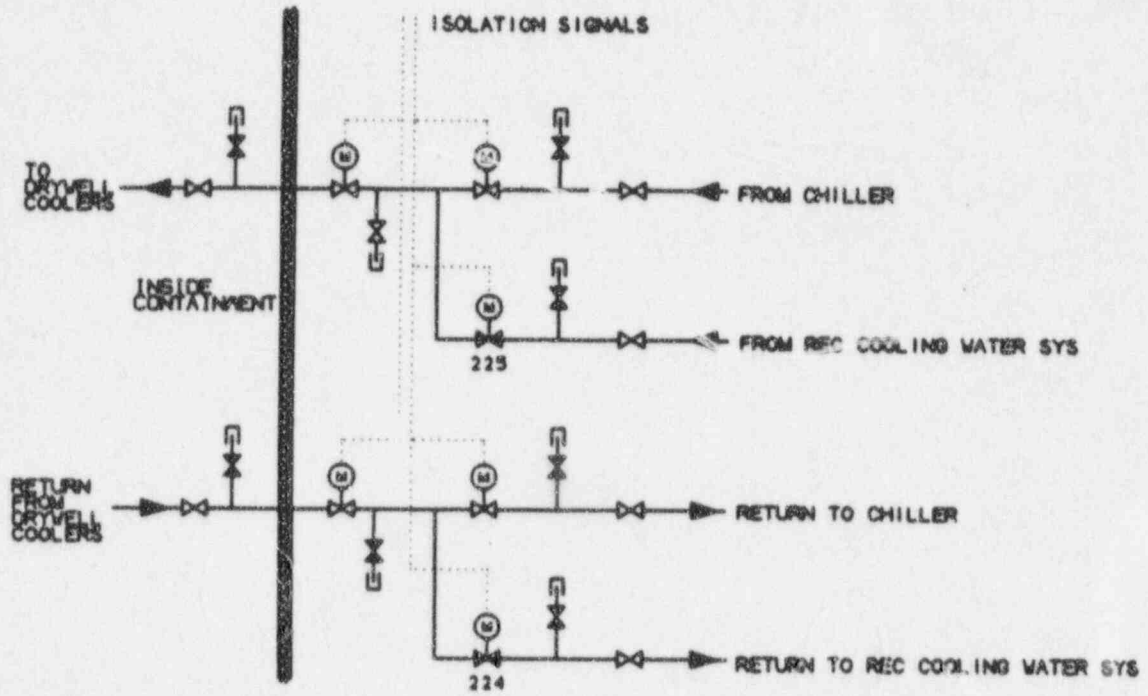
5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Attachment: Drawing-Drywell Chilled System Penetrations

Date: October 30, 1995



DRYWELL CHILLED WATER SYSTEM PENETRATIONS
(TYPICAL)