PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

AUG 10 1984

Mr. A. Schwencer, Chief
Licensing Branch No. 2
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos.: 50-352
50-353

Subject: Limerick Generating Station, Units 1 and 2
Request for Additional Information
Instrumentation Setpoint Methodology

Reference: 1) A. Schwencer to E. G. Bauer, Jr., dated August 25, 1982.

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

The reference 1 letter requested additional information on the methodology used to establish Limerick's Reactor Protection System (RPS) and Engineered Safety Feature (ESF) instrumentation setpoints. This information is provided in the attached draft FSAR pages that will be incorporated into the FSAR via revision 36 which will be submitted in September 1984. We believe that this information closes SER confirmatory issue #26.

Sincerely,

JW Gallagher
for
JS Kemper

DFC/gra/08068405

cc: See Attached Service List

B001
1/1

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

QUESTION 421.32 (7.1, 7.3)

Provide a detailed discussion on the methodology used to establish the trip setpoint and allowable value for each Reactor Protection System (RPS) and Engineered Safety Feature (ESF) channel. Include the following information:

a) The trip value assumed in the FSAR Chapter 15 analyses.

b) The margin between the combined channel error allowance and the total channel error allowance assumed in accident analysis.

c) The values assigned to each component of the combined channel error allowance (e.g., process measurement accuracy, sensor calibration accuracy, sensor drift, sensor environmental allowances, instrument rack drift) the basis for these values, and the methodology used to sum these errors.

d) The degree of conformance to the guidance provided in Regulatory Guide 1.105 Positions C.1 thru C.6.

RESPONSE

These Setpoint Methodology concerns will be addressed by the Action Plan submitted in the reference 421.32-1 letter. Limerick endorses the work scope and schedule proposed by the Action Plan, which was accepted by the NRC staff in the reference 421.32-2 letter.

References

421.32-1 Letter, J. F. Carolan (Chairman, LRG Instrumentation Setpoint Methodology Group) to T. M. Novak (Assistant Director for Licensing, Division of Licensing), "Action Plan to Answer the NRC Staff concerns on Setpoint Methodology for General Electric Supplied Protection System Instrumentation," June 29, 1984.

421.32-2 Letter, B. J. Youngblood (Chief, Licensing Branch No. 1, Division of Licensing) to J. F. Carolan, "Acceptance of Action Plan to Answer NRC Staff Concerns on Setpoint Methodology for General Electric Supplied Protection System Instrumentation," July 23, 1984.