



**PECO ENERGY**

PECO Energy Company  
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November 22, 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  
Withdrawal of Commitment Regarding Station  
Battery Modified Performance Test

Gentlemen:

By letters dated September 10, 1993 and March 30, 1994, PECO Energy made a commitment to submit a proposed Limerick Generating Station (LGS) Technical Specifications (TS) change regarding station battery TS Surveillance Requirements (SRs). The commitment originated in the September 10, 1993 response to a Request For Additional Information (RAI) regarding TS Change Request Number 92-03-0 "Change Refuel Cycle From 18 Months To 24 Months."

The commitment was to incorporate into the LGS TS a modified performance test and frequency described in the 1993 draft revision of the Institute of Electrical and Electronics Engineers (IEEE) Standard 450, "IEEE Recommended Practice for Maintenance and Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications." The affected LGS TS SRs Sections are 4.8.2.1.e and 4.8.2.1.f. The commitment was based on a NRC and PECO assumption that the draft was in its final version and would be approved shortly. The approval and issuance of IEEE Standard 450 was delayed until May 1995, and the option of substituting the modified performance test for the performance test was not included in the final revision. Therefore, PECO Energy withdraws the subject commitment set forth in the preceding letters.

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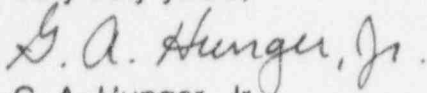
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The General Electric Boiling Water Reactor Owner's Group (G.E. BWROG) is actively pursuing an Improved Standard TS pertaining to station batteries. This activity currently includes the addition of a modified performance test. When complete, PECO Energy will assess the results of the G.E. BWROG committee and the Improved Standard TS for inclusion in LGS's TS.

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

Very truly yours,



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

cc: T. T. Martin, Administrator, Region I, USNRC  
N. S. Perry, USNRC Senior Resident Inspector, LGS  
R. R. Janati, PA Bureau of Radiological Protection