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JOHN S. KEMPER
VICE-PRESIDENT
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AUG 1 6 1984

Mr. A. Schwencer, Chief Licensing Branch No. 2 United States Nuclear Regulatory Commission Washington, DC 20555

> SUBJECT: Limerick Generating Station Docket Nos. 50-352 and 50-353 Raceway Separation Test Program

REF: (1) Exit Meeting of August 2, 1984
between USNRC Power Systems Branch
Personnel and PECo at Limerick

(2) Letter, J. S. Kemper (PECo) to A. Schwencer (NRC), dated 5/18/84

FILE: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

This letter transmits the information requested by your Mr. S. Rhow at the reference (1) meeting concerning the Limerick raceway separation test program.

Attachment 1 provides a copy of Wyle Test Report No. 46960-4, "Electrical Separation Verification Testing on Terminal Blocks and Panel Meters". This test report provides the justification for the PECo internal panel separation criteria which permits termination of redundant Class 1E control circuits on adjacent terminal points on a common terminal block. This report is an addendum to the Design Verification Test Report, "Internal Panel Control Wiring Separation Criteria", Philadelphia Electric Company Report No. 48503, dated September 1, 1982, which was previously reviewed and accepted by the Commission per Limerick SER Section 8.4.1.

Attachment 2 is Section 2.0 of Limerick Drawing 8031-E-1406. This section contains the raceway separation criteria which has been implemented at Limerick.

8408210513 840816 PDR ADDCK 05000352 A PDR Attachment 3 is a copy of the formal PECo "Design Analysis", which documents the rationale used in developing each separation criterion contained in Attachment 2. The raceway separation criteria are based on the results of the raceway separation test program described in Wyle Test Report No. 46960-3 which was previously transmitted to you by Reference (2).

Attachment 4 provides a discussion of and justification for the assumed failure modes which were used as the bases for the raceway separation test program. The salient test results and their applicability to the final Limerick raceway separation criteria contained in Attachment 2 are also discussed.

Attachment 5 provides draft changes to FSAR Section 8.1.6.1.14 to describe the raceway separation criteria and to reference Wyle Test Report No. 46960-3 and Drawing No. 8031-E-1406, Section 2.0. The information contained on these draft FSAR page changes will be incorporated into the FSAR, exactly as it appears on this attachment, in the revision scheduled for September, 1984.

We trust that this information will allow you to complete your review and make a favorable determination on the revised Limerick raceway separation criteria.

Sincerely,

Ju kallagher Jo Kanga

JJG/la la8884m145 Attachments

Copy to: S. Rhow (USNRC) w/a

S. Chaudry (USNRC - Limerick) w/2,3,4,5

See Attached Service List

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