PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
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Docket Nos. 50-352
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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 and 2
Response to Request for Additional Information Concerning
Examination of Reactor Water Cleanup System Welds

Gentlemen:

This letter is being submitted in response to the NRC's request for additional information received during a telephone conversation on January 4, 1996, between PECO Energy and NRC representatives. The NRC is currently reviewing our request to revise the Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," inspection program for Limerick Generating Station (LGS), Units 1 and 2.

By letter dated June 21, 1995, PECO Energy requested that the NRC approve a revision to the GL 88-01 inspection program for LGS, Units 1 and 2, to eliminate 1) the need to perform Ultrasonic Tests (UT) of the Unit 1 Reactor Water Cleanup System (RWCU) piping welds outboard of the primary containment isolation valves, and 2) the need to conduct Inservice Inspection (ISI) pressure testing for Unit 2 on the RWCU system piping outboard of the primary containment isolation valves.

The NRC indicated that, in order to continue its review, additional information is necessary. Specifically, the NRC requested that PECO Energy provide information for LGS that addresses EPRI's information on very high thrust requirements for blowdown valves. Therefore, in response to this request, the following information is provided to support the NRC's continued review of our request.

EPRI Information Regarding Globe Valves Under Blowdown Conditions

The EPRI information regarding globe valves under blowdown conditions has been reviewed, and it does not apply to the PECO Energy Anchor Darling globe valves for the following reasons:

1) The EPRI tested valve (#48) is a small (2") Rockwell Uni-Valve design which is significantly different from the Anchor Darling globe valves in several critical design features.

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Rockwell Uni-Valve	Anchor Darling Globe Valve
Rising/Rotating Stem	Rising/Non-Rotating Stem
Piston Type Disc/Guide	Conventional Guided Plug

2) The EPRI data is based on a single valve test that is uncharacteristic of the globe valves that PECO Energy utilizes in blowdown applications. In addition, PECO Energy's experience with Rockwell Uni-Valves indicates that their characteristic thrust signatures are prone to cyclic loading, thus, making valve factor performance predictions unreliable.

Although the currently available EPRI information regarding globe valves under blowdown conditions does not apply to PECO Energy's Anchor Darling globe valves, it is our understanding that EPRI is attempting to collect additional test data to provide further information on this issue. PECO Energy will evaluate this information and apply it, as appropriate, when it becomes available.

This letter also reaffirms similar commitments made for PECO Energy's Peach Bottom Atomic Power Station facility documented in letters dated August 9, 1995, and August 16, 1995, regarding GL 88-01 inspection activities at PBAPS related to the inspection of RWCU system welds outboard of the primary containment isolation valves.

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

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director - Licensing

cc: T. T. Martin, Administrator, USNRC, Region I
N. S. Perry, USNRC Senior Resident Inspector, LGS