January 17, 1996

Mr. George A. Hunger, Jr. Director-Licensing, MC 62A-1 PECO Energy Company Nuclear Group Headquarters Correspondence Control Desk P.O. Box No. 195 Wayne, PA 19087-0195

SUBJECT: RELIEF REQUEST NO. 23 FOR LIMERICK GENERATING STATION, UNIT 1 (TAC NO. M93209)

Dear Mr. Hunger

By letter dated July 31, 1995, you submitted revisions to the First Ten-Year Interval Inservice Inspection (ISI) Program for the Limerick Generating Station (LGS), Unit 1. Specifically, Relief Request RR-23 requests the use of the American Society of Mechanical Engineers (ASME) Code Case N-498-1, "Alternate Rules for 10-year Hydrostatic Pressure Testing for Class 1, 2, and 3 Systems," with a specific exception regarding the need to apply a 4-hour hold time during pressure testing. By letter dated June 29, 1995, the staff granted relief (RR-12) authorizing the use of ASME Code Case N-498-1.

The staff, with technical assistance from its contractor, the Idaho National Engineering Laboratory (INEL), has reviewed and evaluated the information provided by you in the letter dated July 31, 1995. The staff has determined that compliance with the code will result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Pursuant to 10 CFR 50.55a(a)(3)(ii), the staff authorizes the licensee's proposed alternative contained in RR-23, provided that for insulated systems the VT-2 visual examination is performed once during the 10-year interval in conjunction with a pump functional test, following the expiration of a minimum of 1-hour of pump run time. The staff's evaluation and conclusions are contained in the enclosed safety evaluation. Further, the staff adopts the contractor's conclusions and recommendations presented in the attached Technical Letter Report.

The staff considers this matter resolved and is closing out TAC Nos. M93209. If you have any questions, please contact Frank Rinaldi at (301) 504-1447.

> Sincerely, 1SI

John F. Stolz, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

immerma	ading /FMiraglia	MO'Brien OGC GHill (2) ACRS WDean WPasciak, RGN	FRinald	i evious concu	rrence	0
substantial inclusion and the same of the	A & A	DDT 2/DM	DRPE/PM*	OGC*	PDI 2/D	<b>1</b>
DFFICE	P01-2/6A	PDI-2/PM	DATE/TH		1 COLLO	1 1/1
DFFICE NAME	MO'Brien	FRinaldi:rb	RClark		JStolz	X



## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20565-0001

January 17, 1996

Mr. George A. Hunger, Jr. Director-Licensing, MC 62A-1 PECO Energy Company Nuclear Group Headquarters Correspondence Control Desk P.O. Box No. 195 Wayne, PA 19087-0195

SUBJECT: RELIEF REQUEST NO. 23 FOR LIMERICK GENERATING STATION, UNIT 1 (TAC NO. M93209)

Dear Mr. Hunger:

By letter dated July 31, 1995, you submitted revisions to the First Ten-Year Interval Inservice Inspection (ISI) Program for the Limerick Generating Station (LGS), Unit 1. Specifically, Relief Request RR-23 requests the use of the American Society of Mechanical Engineers (ASME) Code Case N-498-1, "Alternate Rules for 10-year Hydrostatic Pressure Testing for Class 1, 2, and 3 Systems," with a specific exception regarding the need to apply a 4-hour hold time during pressure testing. By letter dated June 29, 1995, the staff granted relief (RR-12) authorizing the use of ASME Code Case N-498-1.

The staff, with technical assistance from its contractor, the Idaho National Engineering Laboratory (INEL), has reviewed and evaluated the information provided by you in the letter dated July 31, 1995. The staff has determined that compliance with the code will result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Pursuant to 10 CFR 50.55a(a)(3)(ii), the staff authorizes the licensee's proposed alternative contained in RR-23, provided that for insulated systems the VT-2 visual examination is performed once during the 10-year interval in conjunction with a pump functional test, following the expiration of a minimum of 1-hour of pump run time. The staff's evaluation and conclusions are contained in the enclosed safety evaluation. Further, the staff adopts the contractor's conclusions and recommendations presented in the attached Technical Letter Report.

The staff considers this matter resolved and is closing out TAC Nos. M93209. If you have any questions, please contact Frank Rinaldi at (301) 504-1447.

Sincerely.

John F. Stolz, Director Project Directorate I-2 Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation

Docket No. 50-352 Enclosure: As stated

cc w/encl: See next page

Mr. George A. Hunger, Jr. PECO Energy Company

## cc:

ľ

J. W. Durham, Sr., Esquire Sr. V.P. & General Counsel PECO Energy Company 2301 Market Street Philadelphia, Pennsylvania 19101

Mr. David P. Helker, MC 62A-1 Manager-Limerick Licensing PECO Energy Company 965 Chesterbrook Boulevard Wayne, Pennsylvania 19087-5691

Mr. Walter G. McFarland, Vice President Limerick Generating Station Post Office Box A Sanatoga, Pennsylvania 19464

Mr. Robert Boyce Plant Manager Limerick Generating Station P.O. Box A Sanatoga, Pennsylvani 19464

Regional Administrator U.S. Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, PA 19406

Mr. Neil S. Perry Senior Resident Inspector US Nuclear Regulatory Commission P. O. Box 596 Pottstown, Pennsylvania 19464

Mr. Craig L. Adams Director - Site Support Services Limerick Generating Station P.O. Box A Sanatoga, Pennsylvania 19464

Chairman Board of Supervisors of Limerick Township 646 West Ridge Pike Linfield, PA 19468 Limerick Generating Station, Units 1 & 2

Mr. Rich R. Janati, Chief Division of Nuclear Safety PA Dept. of Environmental Resources P. O. Box 8469 Harrisburg, Pennsylvania 17105-8469

Mr. Michael P. Gallagher Director - Site Engineering Limerick Generating Station P. O. Box A Sanatoga, Pennsylvania 19464

Mr. James L. Kantner Manager-Experience Assessment Limerick Generating Station P. O. Box A Sanatoga, Pennsylvania 19464

Library US Nuclear Regulatory Commission Region I 475 Allendale Road King of Prussia, PA 19406

Mr. Ludwig E. Thibault Senior Manager - Operations Limerick Generating Station P. O. Box A Sanatoga, Pennsylvania 19464

Dr. Judith Johnsrud National Energy Committee Sierra Club 433 Orlando Avenue State College, PA 16803