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

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

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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:

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