

PHILADELPHIA ELECTRIC COMPANY

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September 4, 1984

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docket Nos.: 50-352
50-353

Subject: Limerick Generating Station, Units 1 and 2
Additional Information for Mechanical Engineering
Branch

Reference: 1) Letter from J. W. Gallagher to A. Schwencer,
dated August 8, 1984
2) Telecon between PECO and NRC Staff on
August 14, 1984

Attachment: Response to NRC Request for Additional Information
on Confirmatory Issue No. 6

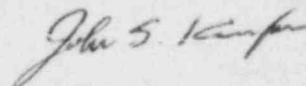
File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

The reference 1) letter transmitted our responses to four
Mechanical Engineering Branch concerns, including SER Confirmatory
Issue No. 6. Pursuant to the reference 2) telecon, the attached
revised response provides additional information on this issue.

We hope that this information will support the final resolution
of SER Confirmatory Issue No. 6. Should any additional information
be required, please do not hesitate to contact us.

Sincerely,



RDC/mlb/08208401

Copy to: See Attached Service List

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Mr. James Wiggins (w/enclosure)
Mr. Timothy R. S. Campbell (w/enclosure)

3. SER Confirmatory Issue #6 - Pressure Isolation Valves Leak Testing

The Surveillance Requirement pertaining to leak testing of pressure isolation valves (PIVs) presented in Section 4.4.3.2.2 of Limerick Draft Technical Specification is not complete. In addition to the two requirements currently identified in Limerick draft Technical Specification, Section 4.4.3.2.2, the staff requires the PIVs to be leak tested (a) prior to entering the Hot Shutdown whenever the plant has been in Cold Shutdown for 72 hours or more and if leakage testing has not been performed in the previous 9 months and (b) within 24 hours following valve actuation due to automatic or manual action or flow through the valve. Provide additional information to assure that the Limerick plant has the following plant features: (1) full closure of PIV's is verified in the control room by direct monitoring position indicators, (2) inadvertent opening of PIV's is prevented by interlocks which require the primary system pressure to be below subsystem design pressure prior to openings, and (3) gross intersystem leakages into the low-pressure core spray, residual heat removal/low-pressure coolant injection, and residual heat removal/shutdown cooling return and suction lines would be detected by high-pressure alarms and increases in the suppression pool level. With these plant features in place, the PIV's are controlled and verified continuously rather than at the intervals specified in (a) and (b) above and then, the exception for relief from the surveillance requirements (a) and (b) could be accepted.

Response

The Limerick Generating Station Technical Specifications (Section 4.4.3.2, as modified during the NRC meetings, held June 11-15, 1984) and the Limerick Pump and Valve Inservice Testing Program Plan require that Reactor Coolant System Pressure Isolation Valves (RCS-PIV) be leak tested:

- a) At least once per 18 months, and
- b) Prior to returning the valve to service following maintenance, repair or replacement work on the valve which could affect its leakage rate.

The additional surveillance requirements (a) and (b) listed in the question above are not required because Limerick has the following features:

- 1) All RCS-PIV's listed in Tech. Spec. Table 3.4.3.2-1 have position indication in the control room.

- 2) All low pressure piping systems isolated by the RCS-PIV's listed in Tech. Spec. Table 3.4.3.2-1 are protected by interlocks which require the reactor coolant system pressure to be below the low pressure system design pressure before a direct path may be achieved to the reactor. These interlocks are described along with all safety related high pressure/low pressure system interlocks in FSAR Section 7.6.1.2.

- 3) Any pressure increase caused by leakage past the Core Spray RCS-PIV's listed in Tech. Spec. Table 3.4.3.2-1 will be sensed and alarmed in the control room when the set point listed in the table is exceeded. After the first refueling outage, any pressure increase caused by leakage past the RHR system RCS-PIV's in Tech. Spec. Table 3.4.3.2-1 will be sensed and alarmed in the control room as above. Before the first refueling outage, the RHR pump discharge line pressure will be observed and recorded once per shift from indicators in the auxiliary equipment room to inform the operators of any pressure increase. Gross intersystem leakage into the CS and RHR systems may also be detected by monitoring the narrow range suppression pool level instrumentation, which will be performed in accordance with Technical Specification 4.6.2.1, and by monitoring flow to the radwaste collection system.