



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20545-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 108 AND 71 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated June 20, 1995, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TSs). These amendments revise TS Surveillance Requirements (SR) 4.6.1.2.a, 4.6.1.2.b, and 4.6.1.2.e, to reference 10 CFR Part 50, Appendix J (hereafter referred to as Appendix J) for the 1) Type A (Integrated Leakage Rate Test), and 2) Drywell-to-Suppression Chamber (bypass) leakage tests instead of providing explicit testing schedules and other requirements in the TSs (this latter test is not a Type A test but has been required by the TSs to be done during the same period as LGS's Type A test).

2.0 EVALUATION

TS SR 4.6.1.2.a currently requires a set of three Type A (Overall Integrated Containment Leakage Rate) tests be performed at 40 ± 10 month intervals during each 10-year service period, with the third test of each set performed during the shutdown for the 10-year plant inservice inspection. Section III.D.1.(a) of Appendix J requires that Type A tests of the containment be scheduled as a set of three tests, to be performed at approximately equal intervals, during each 10-year service period, with the third set to coincide with the shutdown for the 10-year plant inservice inspection.

TS SR 4.6.1.2.b currently requires a Commission approved test schedule for subsequent tests if the Type A test fails to meet $0.75 L_a$. It also requires testing every 18 months until two consecutive tests meet $0.75 L_a$ if two consecutive Type A tests fail to meet L_a . These requirements are also delineated in Section III.A of Appendix J.

TS SR 4.6.1.2.e currently requires Drywell-to-suppression chamber bypass leak tests to be conducted at 40 ± 10 month intervals to coincide with the containment integrated leakage rate tests. As in the above cases, the licensee is requesting to delete the explicit testing schedule and instead state that the tests will coincide with the Type A test (which will be done in accordance with the Appendix J schedule).

Current TS SRs 4.6.1.2.a and b duplicate the requirements delineated in Appendix J. Since the proposed changes reference the controlling regulations instead of paraphrasing the regulations, and because the staff finds there is no safety requirement to perform the surveillances more frequently than required by the regulations, the NRC staff finds the proposed changes to be acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 42605). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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