



TORREY PINES TECHNOLOGY

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A Division of **GA Technologies Inc.**

TPT:056:GLW:84
September 21, 1984

Mr. A. Schwencer
Chief, Licensing Branch #2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Schwencer:

Torrey Pines Technology was requested to submit an interim assessment of the design of the Core Spray System at Limerick Unit I based on the Independent Design Verification Program work performed to date. This assessment was requested to establish that there is no known basis for any safety concern that could potentially delay the start-up program.

TPT's IDVP efforts have concentrated on the safety-related Core Spray System. Results to date have developed the positive impression that an effective design process was established and was effectively implemented. TPT has identified some questions which are identified as potential findings (PF) that must be thoroughly reviewed and classified as Invalid, an Observation with no safety impact, or a Finding with a potential safety impact. This process is not complete as of this date.

TPT's project management and task leaders have deviated from the normal carefully substantiated, objective, documented approach to conduct this interim assessment based on subjective judgment made on individual unresolved potential findings and the aggregate potential findings, both classified and in-process (unresolved). Of the thirty-six potential findings, 17 have been classified and 19 are in process. Of those classified, 6 are Invalid, 9 are Observations, and 2 are Findings.

The remaining 19 have been reviewed by the project manager and the cognizant task leaders. An assessment was made as to their impact on safety relative to granting the low power license to permit fuel loading and rise to 5% power. While the assessment must be considered subjective, it indicates that no substantial safety hazard would be created by the activities typically associated with startup to the 5% power level.

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In summary, while TPT has identified some concerns, these concerns would not warrant delay of Limerick Unit I loading fuel and proceeding to 5% power. Therefore, TPT sees no basis for withholding a license to load fuel and test up to 5% power.

Sincerely,

A handwritten signature in cursive script that reads "George L. Wessman".

G. L. Wessman
Director
Torrey Pines Technology

cc: J. Milhoan, USNRC
V. S. Boyer, PECO
R. A. Mulford, PECO
George Beck, PECO