PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

SEP 27 1984

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

Docket No.: 50-352
50-353

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

References: 1) Letter from J. S. Kemper to A. Schwencer, dated September 4, 1984
2) Telecon between B. Siegel (NRC) and B. Cronin (PECO) on September 24, 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 response to SER Confirmatory Issue number 6, which deals with reactor coolant system pressure isolation valve (RCS-PIV) leak testing. It was identified in the reference 2) telecon that our response should be changed to include leakage past the RHR shutdown cooling supply line RCS-PIV's as leakage which is sensed and alarmed in the control room when the set point listed in the Technical Specifications is exceeded. Pursuant to the reference 2) telecon, the revised response is attached.

Sincerely,

J. W. Gallagher
for
J. S. Kemper

RDC/mlb/09258401

cc: See Attached Service List

B001
1/1

cc: Judge Lawrence Brenner (w/enclosure)
Judge Peter A. Morris (w/enclosure)
Judge Richard F. Cole (w/enclosure)
Judge Christine N. Kohl (w/enclosure)
Judge Gary J. Edles (w/enclosure)
Judge Reginald L. Gotchy (w/enclosure)
Troy B. Conner, Jr., Esq. (w/enclosure)
Ann P. Hodgdon, Esq. (w/enclosure)
Mr. Frank R. Romano (w/enclosure)
Mr. Robert L. Anthony (w/enclosure)
Ms. Maureen Mulligan (w/enclosure)
Charles W. Elliot, Esq. (w/enclosure)
Zori G. Ferkin, Esq. (w/enclosure)
Mr. Thomas Gerusky (w/enclosure)
Director, Penna. Emergency Management Agency (w/enclosure)
Angus R. Love, Esq. (w/enclosure)
David Wersan, Esq. (w/enclosure)
Robert J. Sugarman, Esq. (w/enclosure)
Martha W. Bush, Esq. (w/enclosure)
Spence W. Perry, Esq. (w/enclosure)
Jay M. Gutierrez, Esq. (w/enclosure)
Atomic Safety & Licensing Appeal Board (w/enclosure)
Atomic Safety & Licensing Board Panel (w/enclosure)
Docket & Service Section (w/enclosure)
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.

SEP 26 1984

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 or the RHR shutdown cooling supply line 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 remainder of 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.

SEP 26 1984