

September 20, 1984

Docket Nos. 50-352/353

Mr. Edward G. Bauer, Jr.
Vice President & General Counsel
Philadelphia Electric Company
2301 Market Street
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Dear Mr. Bauer:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - LIMERICK

The NRC staff has completed a review of amendments to the FSAR effecting the Limerick Initial Plant Test Program through FSAR Amendment 35. During this review, the staff noted that changes have been made to the previously evaluated Chapter 14 without sufficient justification. Therefore, it is requested that you respond to enclosed request for additional information at the earliest possible date.

Sincerely,

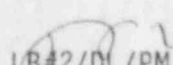
A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

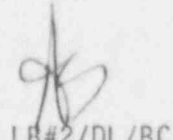
Enclosure: As stated

cc: See next page

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LIMERICK

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REQUEST FOR ADDITIONAL INFORMATION AND STAFF POSITIONS

LIMERICK GENERATING STATION, UNITS 1/2

640.8 Modify the following test abstracts contained in FSAR Table 14.2-4 to clearly indicate the source of acceptance criteria to be used in determining test adequacy.

1. (P-2.1) 125 V (Div III, IV) dc Safeguard Power System
2. (P-2.2) 125/250 V (Div I, II) dc Safeguard Power System
3. (P-11.1) Service Water System
4. (P-15.1) Turbine Enclosure Cooling Water System
5. (P-53.1) Standby Liquid Control System
6. (P-65.1) Radwaste Enclosure HVAC System
7. (P-70.1) Standby Gas Treatment, Reactor Enclosure Air Recirculation, Secondary Containment Isolation
8. (P-76.2) Post-Accident Sampling System

Items 1, 2, and 5-7 are tests which had appropriate acceptance criteria that was deleted by Amendment 28. Items 3, 4 and 8 are test abstracts added by Amendment 28 which do not contain appropriate acceptance criteria.

- 640.13
- a. Modify the dc Power System tests (P-2.1), P-2.2) to reinstate testing of all dc loads necessary to safe shutdown at minimum terminal voltage or to demonstrate that the voltage drop at load to these components is acceptable.
 - b. Provide justification for deleting the reference to system bus voltages in the acceptance criteria of the 13.2 kV Unit Auxiliary and 4 kV Safeguard Power System test abstracts (P-3.1, P-4.1).
 - c. The Unit Scope section for the dc Power System tests (P-2.1, P-2.2) states that testing will be performed on Unit 1, Unit 2, and common systems. FSAR Subsection 8.3.2.1 states there are no common or shared dc power systems. Modify the Unit Scope of these two test abstracts accordingly.

640.14 The Loss of Instrument Air test (P-100.2) has been revised to meet the requirements of Regulatory Guide 1.68.3, "Preoperational Testing of Instrument and Control Air Systems." This modification is acceptable to the NRC staff; however, the following modifications should be made:

1. FSAR Subsections 1.8 and 14.2.7.2 should delete reference to Regulatory Guide 1.80 as it is superseded by Regulatory Guide 1.68.3.

2. FSAR Subsection 1.8 should either state that Limerick will be in conformance with this guide or provide technical justification for any exceptions.
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- 640.21 The MSIV Leakage Control System Test (STP-38) has been deleted. The deletion is acceptable if preoperational testing of the system is accomplished at rated temperature.
 - 640.23 The Main Steam Relief Valves (MSRVs) Performance test (STP-26) should reinstate measurement of the capacity of each MSRV and provide acceptance criteria consistent with accident analysis assumptions.