

10CFR50.71(e)(4)  
10CFR50.54(a)(3)

## PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS  
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June 30, 1992

DAVID R. HELWIG  
VICE PRESIDENT  
NUCLEAR ENGINEERING & SERVICES

Docket Nos. 50-352  
50-353

License Nos NPF-39  
NPF-85

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2  
Submittal of Revision 2 of the Updated Final  
Safety Analysis Report

Dear Sirs:

In accordance with 10CFR50.71(e)(4) and 10CFR50.4(b)(60), this letter submits one original and ten (10) copies of Revision 2 of the Updated Final Safety Analysis Report (UFSAR) for Limerick Generating Station (LGS), Units 1 and 2. The enclosed copies of Revision 2 are being provided to the NRC on a replacement page basis with a list of effective pages identifying the latest revision date of all current pages in accordance with 10CFR50.71(e)(1). In each revision package, we have also provided page replacement instructions for incorporating Revision 2 into the NRC copies of the LGS UFSAR. As required by 10CFR50.71(e)(5), each replacement page includes a bold vertical line in the margin adjacent to each area changed and the date of change is included on each page. Revision 2 reflects changes made up to a maximum of six months prior to this submittal in accordance with the requirements of 10CFR50.71(e)(4). As a result, the UFSAR Revision 2, has been made to reflect changes made to LGS, Units 1 and 2, under the provision of 10CFR50.59, at least up to January 1, 1992.

The enclosed UFSAR Revision 2 also contains the annual revision of the Quality Assurance (QA) Program Description which is being submitted in accordance with 10CFR50.54(a)(3). The revised QA Program Description (i.e., Section 17.2 of the UFSAR Revision 2) reflects editorial and organizational changes and those changes described in Attachment 1 as required by 10CFR50.54(a)(3)(ii).

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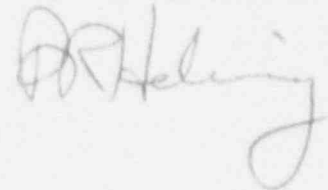
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Based on the information provided in Attachment 1, we have concluded that the QA Program Description changes included in Revision 2 of the UFSAR do not reduce the commitments in the QA Program Description previously accepted by the NRC.

As required by 10CFR50.71(e)(2)(i), I certify that to the best of my knowledge, Revision 2 of the UFSAR accurately reflects information and analyses submitted to the NRC, or prepared pursuant to NRC requirements as described above. In addition, as required by 10CFR50.71(e)(2)(ii), Attachment 2 to this letter identifies changes made under the provision of 10CFR50.59 and included in the enclosed Revision 2, but not previously submitted to the NRC.

If you have any questions or require further information, please contact us.

Very truly yours,



Attachments

Enclosures

cc: T. T. Martin, Administrator, Region I, USNRC w/attns/2 copies  
of enclosures  
T. J. Kenny, USNRC Senior Resident Inspector, LGS w/attns/1  
copy of encl

## Attachment 1

PHILADELPHIA ELECTRIC COMPANY  
 LGS QUALITY ASSURANCE (QA) PROGRAM DESCRIPTION CHANGES  
 LGS UFSAR REVISION 2  
 (Program Description Revision 10)  
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<u>PARAGRAPH NUMBER</u>	<u>DESCRIPTION OF CHANGES</u>	<u>CLASSIFICATION OF CHANGES</u>
17.2.1	Changed "five" Senior Vice Presidents to "six."	Organizational
17.2.1.1	Changed "Engineering and Production" to "Production."	Organizational
17.2.1.2	Added "Nuclear" to "Quality Assurance Program."	Commonality*
17.2.1.2.3	Changed Performance Assessment "Division" to "Section."	Organizational
17.2.1.2.3 e	Deleted "deficiencies" Added MCARS. Added "Require that deviations be tracked in accordance with Administrative Procedures."	Clarification
17.2.1.2.3 g, k, l	Changed "QA/QC" to "QA/QV."	Clarification
17.2.1.2.3 p	Deleted "Administration of internal audits and surveillances." Added "Assess through NQA audits, surveillances, ...covered by the NQA Program."	Organizational
17.2.1.2.3 q	Deleted.	Organizational
17.2.1.2.3.1	Changed format of paragraph. Changed "Quality Control" to "Quality Verification."	Commonality* Organizational
17.2.1.2.3.1 d	Added "site" before "Audit Program."	Clarification
17.2.1.2.3.1 h	Added "Facility" before "Quality Assurance Program."	Clarification

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<u>PARAGRAPH NUMBER</u>	<u>DESCRIPTION OF CHANGES</u>	<u>CLASSIFICATION OF CHANGES</u>
17.2.1.2.3.1 i	Changed "requests" to "directives."	Editorial
17.2.1.2.3.1.1	Added "site Quality Division" before "Manager."	Clarification
17.2.1.2.3.1.1 b	Former Item h was added to k; added "scheduling and planning," added "and Technical Specifications."	Editorial Commonality*
17.2.1.2.3.1.1 d	Added "site Quality Division." Deleted "Limerick Quality."	Commonality*
17.2.1.2.3.1.1 f (formerly item i)	Rearranged sentences (former Items f and g were deleted); the meaning was not clear.	Editorial
17.2.1.2.3.1.1 g (formerly Item j)	Added "and certified."	Clarification
17.2.1.2.3.1.1 i (formerly Item l)	Deleted "Through future audits and surveillances."	Editorial/ Commonality*
17.3.1.2.3.1.2	Changed "Quality Control" to "Quality Verification" and "QC" to "QV" throughout the section. Added "site Quality Division," and deleted "Limerick Quality."	Organizational Editorial/ Commonality*
17.2.1.2.3.1.2 b	Deleted "etc., as appropriate."	Editorial
17.2.1.2.3.1.2 c	Added "site Quality Division," deleted "Limerick Quality."	Editorial/ Commonality*

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<u>PARAGRAPH NUMBER</u>	<u>DESCRIPTION OF CHANGES</u>	<u>CLASSIFICATION OF CHANGES</u>
17.2.1.2.3.1.2 e	Added "procedure" before "supplements."	Clarification
17.2.1.2.3.1.2 f	Added "and certified to perform assigned activities."	Commonality*
17.2.1.2.3.1.2 g	Replaced with new Item g.	Clarification
17.2.1.2.3.1.2 h	Deleted "perform," added "requirements and QV."	Clarification
17.2.1.2.3.1.2 j, k, l	Added new items.	Organizational
17.2.1.2.3.1.3	Deleted "directly" added "site Quality Division," deleted "Limerick Quality."	Editorial/ Commonality*
17.2.1.2.3.1.3 b	Added "site Quality Division," deleted Limerick Quality."	Commonality*
17.2.1.2.3.1.3 d	Deleted item, renumbered succeeding items.	Administrative
17.2.1.2.3.1.3 e (formerly Item f)	Deleted "site," added "station Administrative Procedures and."	Commonality*
17.2.1.2.3.1.3 f (formerly Item g)	Changed "purchase orders" to "procurement documents."	Commonality*
17.2.1.2.3.1.3 g (formerly Item h)	Deleted "dispositions," added "for conditions adverse to quality."	Commonality/ Clarification
17.2.1.2.3.1.3 h (formerly Item i)	Added "tracking...and CARs."	Clarification

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<u>PARAGRAPH NUMBER</u>	<u>DESCRIPTION OF CHANGES</u>	<u>CLASSIFICATION OF CHANGES</u>
17.2.1.2.3.1.3 i (formerly Item j)	Deleted "Issue CARs and verify corrective action for." Added "Document."	Clarification
17.2.1.2.3.1.3 j, and k (formerly n and o)	Deleted previous Item k. Deleted previous Item l (added to g and h). Deleted previous Item m.	Administrative Administrative Clarification Organizational/ Administrative
17.2.1.2.3.1.4	Added "site Quality Division," deleted "Limerick Quality."	Commonality*
17.2.1.2.3.1.4 a	Deleted "activities of the."	Editorial
17.2.1.2.3.1.4 b	Changed "such" to "the."	Commonality*/ Clarification
17.2.1.2.3.1.4 c	Added new item.	Commonality*
17.2.1.2.3.1.4 d	Deleted "issue," added "development, approval, and issuance of."	Clarification
17.2.1.2.3.1.4 e	Deleted "overall planning," added "and approval."	Clarification
17.2.1.2.3.1.4 h (formerly Item c)	No change to text.	Editorial
17.2.1.2.3.3	Changed "division" to "Section" and "Manager" to "Superintendent" several places.	Organizational
17.2.1.2.3.4	Changed format. Changed "Audit (section)" to "Vendor Evaluation." Changed "NDE Services" to "NDE Support."	Commonality* Organizational Organizational

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<u>PARAGRAPH NUMBER</u>	<u>DESCRIPTION OF CHANGES</u>	<u>CLASSIFICATION OF CHANGES</u>
17.2.1.2.3.4.1	Changed format. Deleted "Technical direction for the Nuclear Fuel QA Program" (added to 17.2.1.2.3.4.2).	Commonality* Organizational
17.2.1.2.3.4.2	Changed "Audit" to "Vendor Evaluation" (two places). Changed format. Deleted "supervision for selected services audits, security screening audits, vendor audits and surveillances." Added "a. Providing administrative direction for the performance of vendor evaluation activities including audits, surveillance, and commercial grade surveys." Added "b. Directing the performance of contractor security screening audits and special services audits." Added "d. Technical direction for the Nuclear Fuel QA Program."	Organizational Commonality* Organizational/ Clarification Organizational/ Clarification Organizational
17.2.1.2.3.4.3	Changed "services" to "support" (two places). Changed format. Deleted responsibility for the performance of NDE (See 17.2.1.2.3.1.2). Added Items a through h.	Organizational Commonality* Organizational

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<u>PARAGRAPH NUMBER</u>	<u>DESCRIPTION OF CHANGES</u>	<u>CLASSIFICATION OF CHANGES</u>
17.2.1.2.3.4.4	Changed format. Deleted "Administrative supervision and technical direction to the QA assistants and clerical staff." Added "and analysis of trend information "(Item b). Added "QA Program Description" (Item n).	Commonality* Administrative  Clarification
17.2.1.3	Changed "Engineering and Production" to "Production" (four places). Deleted "Production Department." Deleted "Services Division." Deleted "Training Section." Changed "Methods Section ." to "Methods and Training Division." Changed "Manager Services Division" to "Vice President, Production." Changed "Maintenance Central Shops" to "Oregon Shop."	Organizational  Organizational Organizational Organizational Organizational Organizational
17.2.1.4	Changed "General Manager" to "Senior Vice President."	Organizational
17.2.1.4.1	Changed "Vice President" to "Senior Vice President." Deleted "The Department is composed of four divisions." Added "The only department organization."	Organizational Clarification Clarification



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<u>PARAGRAPH NUMBER</u>	<u>DESCRIPTION OF CHANGES</u>	<u>CLASSIFICATION OF CHANGES</u>
17.2.2.2	(Third paragraph) Changed "Stores and Purchasing" to "Purchasing." (Fourth paragraph) Changed "construction" to "modification."	Editorial Editorial
17.2.2.6	(First paragraph) Changed "(I & C)" to "(M/I & C)."	Editorial
17.2.2.8	Deleted "Startup."	Editorial
17.2.2.16	Changed "Manager" to "Superintendent." Changed "Division "(PAD)" to "Section (PAS)."	Organizational Organizational
17.2.3.3.1	Changed "are" to "as."	Editorial
17.2.5.10	(Formerly second paragraph of 17.2.5.9) Changed "Manager Limerick Quality Division" to "Corporate Nuclear Quality Manager."	Clarification Editorial
17.2.9.3	Deleted "and Engineering and Production."	Organizational
17.2.9.7	Changed NDE "Services" to "Support."	Organizational
17.2.12.4	Changed "Testing and Laboratories" to "Corporate Laboratories."	Organizational
17.2.14.8	Changed "handbook for permits and blocking" to "Administrative Procedures."	Organizational

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17.2.18.6	Added "except as otherwise indicated."	Clarification
17.2.6 a	Added "Unit staff is audited annually."	Clarification
17.2.18.6 i	Changed "Electrical and Mechanical" to "I & C."	Organizational
17.2.18.6 j	Changed "Stores and Purchasing" to "Procurement."	Clarification
17.2.18.6 m	Changed format. Added "(audited annually)" (three places).	Commonality* Clarification
App 17.2 I	Added "N=Nuclear Group" to the notes. Changed "Testing and Laboratories" to "Corporate Laboratories."	Administrative  Organizational
App 17.2 II	(Second paragraph) Changed "Executive" Vice President to "Senior" Vice President.	Organizational
17.2 II a	Changed to reference Reg Guide 1.33.	Clarification

\* Sections 17.2.1 through 17.2.1.6.1 have been made identical to the corresponding sections of the Peach Bottom Atomic Power Station UFSAR, Rev 10, dated July, 1992. Format and content changes for the purpose of commonality are so indicated.

Changes made under 10CFR50.59 included in Revision 2 of the Limerick Generating Station, Units 1 and 2 Updated Final Safety Analysis Report, but not previously submitted to the NRC, are identified below.

Modification Number	Description
0949	Unit 1 and Common - Upgrade of power supplies to the plant telephone and radio systems.
5914	Unit 1 - Addition of a locked open ball valve in the diesel generator starting air line between the air start manifold and the pressure regulator for the lower main bearing lube oil booster.
5993	Unit 1 and Common - Upgrade of radio and communications between the Main Control Room, Remote Shutdown Panel, and Operations Support Center to facilitate communication in the event of a fire or loss of power.
6050	Unit 1 and Common - Relocation of snubber testing equipment, personnel anti-contamination clothing storage/issue, Unit 1 and 2 Condensate Ion Chromatography and hot tool storage/issue areas to the Turbine Building and Hot Maintenance Shop areas.
6054	Unit 1 and Common - Installation of remote monitoring equipment and annunciation in the Main Control Room for the Water Processing Facility.
6119	Unit 1 - Addition of hydraulic accumulators to the Electro-Hydraulic Control (EHC) system to increase system hydraulic damping and thereby minimize weld failures.
6125	Unit 1 and Common - Installation of the lower parking lot for approximately 300 vehicles.

Modification Number	Description
6162	Unit 1 and Common - Replacement of air conditioning units in the Counting Room, Conventional Chemistry Lab, and Warm/Radioactive Chemistry Lab.
9061	Unit 1 and Common - Upgrade of Operations Support Center to become the Main Control Room Annex in order to reduce traffic in the Main Control Room.
9079	Unit 1 and Common - Removal of split plant physical security barriers which are no longer necessary with the establishment of full plant physical security.