



PECO ENERGY

**PECO ENERGY COMPANY
LIMERICK GENERATING STATION
UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353**

**ANNUAL 10CFR50.59 AND COMMITMENT REVISION REPORT
JULY 1, 1994 THROUGH JUNE 30, 1995**

***LIMERICK
GENERATING
STATION***

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**PECO ENERGY COMPANY
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UNITS 1 AND 2
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**ANNUAL 10CFR50.59 AND COMMITMENT REVISION REPORT
JULY 1, 1994 THROUGH JUNE 30, 1995**

This report provides a brief description of changes to the facility and procedures as described in the Safety Analysis Report, tests, and experiments that were implemented between July 1, 1994 and June 30, 1995. A summary of the safety evaluation for each item concluded that an unreviewed safety question, as defined in 10CFR50.59(a)(2), was not involved. Summaries of revised commitments to the NRC are being included as recommended in the NEI Commitment Management Guideline.

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SAFETY EVALUATION SUMMARIES

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MOD 6178 Unit 1 Unit 2 Common

This modification replaced the four (4) non-safety related instrument air dryers on Unit 1 and Unit 2. The replacement and operating cycle for the filters was changed to be more efficient. The change also allows for improved filter pressure drop monitoring so that filter replacements can be planned. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD 6208 Unit 1 Unit 2 Common

This modification constructed an on-site storage area for low level radwaste (LLRW) and contaminated reusable material in an existing fenced-in yard southwest of the spray pond and northwest of the Unit 1 cooling tower. This allowed minimal storage capacity for LLRW. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD P00166, P00167, and P00168 Unit 1 Unit 2 Common

These modifications installed piping and valves in the common Emergency Service Water (ESW) and Residual Heat Removal Service Water (RHRSW) systems. P00166 added piping and valves to unitize the ESW system. Unitization allows work on one unit to be performed without affecting the other unit. P00167 crossties the ESW and RHRSW supply headers at the Spray Pond Pumphouse (SPPH) yard and then again in the pipe tunnel. The crossties allow one supply header to support operation of both systems while the other supply header is out of service. P00168 crossties the RHRSW return headers in the pipe tunnel, again allowing one header to be removed from service while the remaining header supports operation of both loops. There are different limitations associated with the various configurations provided by these mods. The ESW unitization mod is a permanent configuration change while both crossties (P-167 and P-168) will only be used during emergency/maintenance situations. These modifications affected a section of the UFSAR and are an overall enhancement to operations and maintenance.

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MOD P00195 Unit 1 _ Unit 2 x Common _

This modification replaced the Control Rod Drive (CRD) pumps as a result of increased reactor operating pressure due to power rerate. The new pumps develop higher discharge pressure in order to supply design CRD system flow at rated conditions. The existing pump, motor, and gearbox were replaced with a pump and motor unit that does not require Turbine Enclosure Cooling Water (TECW) cooling. Minor piping modifications were required to accommodate the new pump and remove the TECW interface. This modification was installed prior to the rerate outage on Unit 2. The CRD pumps are non-safety related and non-seismically qualified, and the plant is designed for safe shutdown in the event of loss of CRD pumping capability. This modification affected a UFSAR Section and is an overall enhancement to operations.

MOD P00210 Unit 1 _ Unit 2 x Common _

This modification improved the speed control of the Reactor Core Isolation Cooling (RCIC) Turbine during RCIC system startup, and thus improved the overall reliability of the RCIC system. As identified in GE SIL 377, the RCIC System as designed will experience a significant speed spike during the initial system startup. The higher reactor pressure after power rerate increases the potential for an overspeed trip during system startup. In order to improve the speed control during startup, the steam admission valve was replaced with a cage type disc, and the logic modified to throttle the steam flow to the turbine for a specified time period. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD P00212 Unit 1 x Unit 2 x Common _

This modification relocated or upgraded specific High Pressure Coolant Injection (HPCI) system components so that the HPCI system room can be qualified for a higher temperature. This modification eliminated the HPCI system's reliance on the B loop of ESW. Specific components affected include the HPCI system governor controls, the turbine stop valve lower limit switch, the auxiliary oil pump controlling pressure switch, the turbine magnetic speed pickup connector and the steam supply valve motor and thermal overload. This modification affected a UFSAR Section and is an overall enhancement to operations.

MOD P00279 Unit 1 _ Unit 2 x Common _

This modification added uninterruptible power supplies (UPS) to selected feedwater control circuits. These UPSs were installed to increase the reliability of the feedwater system. The UPSs provide a source of power during short interruptions of AC power upon transfer of certain station buses which reduces the likelihood of a scram. This modification affected a section of the UFSAR and is an overall enhancement to operations.

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MOD P00283 Unit 1 _ Unit 2 Common _

This modification installed a 2" diameter bypass drainage line downstream of the discharge check valve for the 2A, 2B, and 2C Reactor Feed Pumps (RFP). The new bypass line reduces the amount of time for the drainage of RFP discharge lines. This modification affected a section of the UFSAR and is an overall enhancement to maintenance and operations.

MOD P00289 Unit 1 _ Unit 2 Common

This modification deleted several recorders in the Main Control Room (MCR) and various other locations at Limerick Generating Station (LGS) that are no longer required per the recommendations of a Recorder Reduction/Replacement Project team. The recorders that were deleted were reviewed by Operations, System Managers, and various other station organizations. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD P00290 Unit 1 _ Unit 2 _ Common

This modification replaced several existing recorders with new (Westronics 2100 Series) recorders as installed in the MCR per Modification 6156. Existing Recorders were replaced because they are no longer manufactured and a reliable supply of spare parts is not available. This modification affected a section of the UFSAR and is an overall enhancement to maintenance and operations.

MOD P00333 Unit 1 _ Unit 2 _ Common

This modification changed the Water Treatment Plant to allow the use of a vendor supplied, reverse osmosis water processing system. This modification also removed the former Quality Control (QC) record storage vault which was located in the proposed reverse osmosis trailer location. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD P00370 Unit 1 _ Unit 2 Common _

This modification upgraded valves HV-049-2F013, HV-051-2F017A, B, C, and D, HV-052-2F005, and HV-052-2F037 to eliminate the possibility of the phenomena of pressure locking and further modified valves HV-051-2F017A, B, C, and D to enhance valve testing. These are injection valves for the RCIC, Residual Heat Removal (RHR) and Core Spray Systems. This modification affected a section of the UFSAR and is an overall enhancement to maintenance and operations.

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MOD P00383 Unit 1 Unit 2 Common

This modification improved human factors aspects of certain reactor vessel level indicator instrument loops by modifying the instrument loops' outputs to display level indication. This modification also reduced indication inaccuracies due to "off-calibration" pressure effects by providing reactor "pressure compensation" of the Fuel-zone water level indication displayed on recorders and indicators. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD P00411 Unit 1 Unit 2 Common

This modification upgraded the Condensate Filter Demineralizers and the Liquid Radwaste Equipment Drain Filter with improved filters to reduce iron in the Condensate and Feedwater streams to less than 0.5 ppb and to reduce backwash volume. An additional benefit is the reduction of the pre-coat waste product. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD ECR 94-05131 Unit 1 Unit 2 Common

This modification removed the decontamination transfer table 0A-S331 which was located in the Radwaste Building (Elevation 217). Changes in the resin process method eliminated the need for this table. Wet solid radioactive waste material is processed at LGS using an external processing station in conjunction with a vendor's mobile processing equipment. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD ECR 94-05511 Unit 1 Unit 2 Common

This modification removed the hydraulic press (compactor) 00-S324 which was located in the Radwaste Building. The hydraulic press was originally provided to compress radwaste material such as paper and rags, thereby reducing radwaste disposal volume. Dry radwaste material such as paper and rags is now processed through off site processing. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD ECR 94-05848 Unit 1 Unit 2 Common

This modification added a redundant air supply from the lower air start header to the aft main bearing booster pump on each of the Emergency Diesel Generators (EDG). This was a vendor (Coltec) recommendation to enhance long-term EDG reliability. This change affected a section of the UFSAR and is an overall enhancement to operations.

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MOD ECR 94-05916 Unit 1 Unit 2 Common

This modification removed or abandoned the holding pond chemical equipment, continuous sample instrumentation, PVC piping and associated electrical controls. The equipment was designed to neutralize the contents of the holding pond so that it would meet the requirements of the National Pollutant Discharge Elimination System (NPDES) permit when the water is discharged. This has not been and is not anticipated to be required. The equipment and associated PVC piping and controls were removed or abandoned in place. The holding pond continuous sample lines and instrumentation allow sampling of the holding pond. Sampling of the holding pond is achieved by using the recirculation pump to obtain a grab sample. The continuous sample PVC lines and in-line instrumentation were removed or abandoned in place. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD ECR 94-06378 Unit 1 Unit 2 Common

This modification added a fuel oil sample tap to each of the EDG fuel transfer lines. The fuel oil flow integrator, which was not valved into the system, was removed and the sample tap installed in its place. The new sample taps eliminate some administrative requirements because the new location is not in a confined space. This modification affected a section of the UFSAR and is an overall enhancement to maintenance and operations.

MOD ECR 94-09998 Unit 1 Unit 2 Common

This modification involved the use of a new reactor pressure vessel (RPV) head strongback/carousel and accessories during refueling outage at LGS. The strongback/carousel combines the functions of the existing stud tensioner, RPV head strongback, and nut and washer racks. The strongback/carousel is used for both Units 1 and 2. The strongback/carousel shortens both the time required for vessel stud tensioning operations and the time required for rigging and RPV head component transfer. This modification affected a section of the UFSAR and is an overall enhancement to maintenance and operations.

MOD ECR 94-10598 Unit 1 Unit 2 Common

This modification reinstalled ductwork that was previously removed from the Hot Shop due to relocation of tools, and installed (4) portable HVAC units in the decontamination room and in the pump repair cell to support decontamination activities. The original Hot Shop HVAC system design parameters were maintained. This modification affected a section of the UFSAR and is an overall enhancement to maintenance.

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MOD ECR 94-10694 Unit 1 Unit 2 Common

This modification provided the capability to electrically interlock the nuclear steam supply shutoff system (NSSS) isolation circuitry to allow for the extension of either of the reactor enclosure secondary containments (Zone I or Zone II) to include the refuel area secondary containment (Zone III). This modification affected a section of the UFSAR and is an overall enhancement to maintenance and operations.

MOD ECR 94-10875 Unit 1 Unit 2 Common

This modification deleted the Health Physics (HP) issue cage. Originally installed as part of Modification 6050, this structure is no longer required as a distribution point for radiation protective clothing. This area can now be used for other activities as deemed appropriate. These activities, e.g., placement of temporary facilities trailers, etc., will be controlled by existing plant procedures governing the use of temporary structures. This modification affected a section of the UFSAR and is an overall enhancement to operations.

MOD ECR 94-11314 Unit 1 Unit 2 Common

This modification involved the use of GE-11 debris-resistant lower tie plates. These debris-resistant lower tie plates were used on four (4) lead use fuel assemblies during Limerick 2 Reload 3. The new lower tie plates incorporate a debris filter consisting of a 9x9 matrix of cylindrical bosses interconnected by thin webs. This filter is designed to stop debris larger than 0.1 inches from entering the fuel bundle through the lower tie plate. General Electric (GE) has tested the new lower tie plate and has determined that there are no safety hazards associated with the new design. This change affected a section of the UFSAR and is an overall enhancement to operations.

MOD ECR 94-11583 and ECR 94-11623 Unit 1 Unit 2 Common

These temporary modifications defeated the automatic isolation of the 2A and 2B RHR system primary containment isolation valves (PCIV). This activity was implemented only during shutdown conditions with reactor water level 22 feet above the reactor flange. Under these conditions, the PCIVs are not required to be operable and there is sufficient coolant inventory to allow operator action in response to a level reduction. This activity increased the reliability of the RHR shutdown cooling mode during shutdown conditions by eliminating the possibility of inadvertent isolations of shutdown cooling.

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MOD ECR 94-11818 Unit 1 Unit 2 Common

This modification installed new Main Steam Line Plugs (SLPs). The GE plugs replaced the Westinghouse plugs. The SLPs are used during reactor refueling or servicing. This modification affected a section of the UFSAR and is an overall enhancement to operations.

NCR 92-00355 Unit 1 Unit 2 Common

This NCR and associated UFSAR change evaluated the use-as-is disposition for the normal waste drains in the Unit 1 and 2 Reactor Enclosure HVAC rooms. These drains were found to be routed to the storm drain system. Storm drain diverter valve 68-0035 at manhole S-5.3 will be administratively controlled to divert all possible flow from these rooms to the holding pond to avoid a potential NPDES permit violation and prevent an unmonitored release to the Possum Hollow Creek.

This NCR final disposition of "use-as-is" allowed continued operation with the diverter valve in the closed position. It provided guidance to allow Operations to open the valve in the event of heavy rainfall. Administrative controls were proposed to contain any leakage from the HVAC rooms to contain any leakage from the HVAC rooms and obtain chemistry samples at the outfall to Possum Hollow Creek if leakage occurred.

NCR 93-00269 Unit 1 Unit 2 Common

This NCR evaluated several fire doors and one fire door frame which were missing Underwriters Laboratory (UL) labels. These labels were required to be in place by the UFSAR, Appendix 9A, Fire Protection Evaluation Report. The NCR originally developed an approved disposition of re-work, i.e. have UL evaluate the doors and frame and then add the labels.

UL found a problem with one door frame 473 that could not be resolved by re-work. Therefore, Rev. 1 to this NCR was initiated to address the situation. At the same time, the UFSAR was revised so that it no longer required labels on the doors. The door frame 473 has been evaluated as being capable of withstanding for three hours the maximum fire expected in the two fire areas that the door and frame separate. Based upon this evaluation of the doors and door frame, a new disposition of use-as-is has been approved.

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NCR 94-00208 Unit 1 _ Unit 2 _ Common x

This NCR evaluated the installation of 7252 lbs. of LEXAN material on the refuel floor without prior engineering evaluation and approval. This material is combustible and increases the combustible load and fire severity on the floor. The material was installed to provide improved radiological control barriers for contamination and hot particle concerns. The disposition of the NCR was use-as-is.

NCR 94-00210 Unit 1 x Unit 2 x Common _

This NCR evaluated a revision to the safeguard battery loading tables and service test profile in the UFSAR. Calculation LE-052 was previously revised and supports the change. Recent modifications were included in the revision along with lessons learned from a recent battery analysis at Peach Bottom. The service test profile contains margin over the actual loads in the calculation to allow for future load growth without requiring the calculation to be re-run. The disposition of the NCR was use-as-is with a documentation change.

NCR 94-00251, 94-00262, 94-00265, and 94-00266 Unit 1 x Unit 2 x Common _

These NCRs evaluated pinhole leaks on ESW piping associated with the following room coolers:

<u>NCR</u>	<u>Cooler No.</u>	<u>Room</u>
NCR 94-00251	Cooler 1EV210	Unit 1 A/C RHR
NCR 94-00262	Cooler 1AV208	Unit 1 RCIC
NCR 94-00265	Cooler 1BV210	Unit 1 B/O RHR
NCR 94-00266	Cooler 2BV208	Unit 2 RCIC

These NCRs provided an interim use-as-is disposition to allow the unit coolers to remain in service until they can be repaired during their next system outage window. The leaks are currently passive (seal themselves) and any recurring leakage through these 'pinholes' would not threaten the operability of the supported system based on the size of the hole and location. Additionally, ultrasonic testing confirmed the pinhole does not threaten the seismic integrity of the room cooler or the ESW system. This was a temporary condition and did not adversely impact operations.

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NCR 95-00002 Unit 1 Unit 2 Common

This NCR addressed changing the description of the Main Steam Isolation Valves (MSIVs) in the UFSAR since the previous description of operation was inaccurate. The UFSAR stated that the MSIVs had independent closure capability with either springs or pneumatics. However, during certain accidents with high ambient pressure, a combination of springs and pneumatics are required to close the MSIVs. The disposition of the NCR was use-as-is.

NCR 93-00057 Unit 1 Unit 2 Common

This NCR evaluated the existence of some 'lost parts' in the Unit 2 reactor vessel. These parts were a small piece of material resembling weld slag, a small item resembling a ball bearing, a piece of plastic, and the cumulative effects of other previously lost parts. The evaluation concluded that the lost parts would not compromise safe reactor operations. The disposition of the NCR was use-as-is.

NCR 93-00106 Unit 1 Unit 2 Common

This NCR provided an interim use-as-is disposition for a pinhole leak in the 4" ESW piping for the 2C RHR pump components. Leakage through the pinhole would not threaten the operability of the supported system based on the size of the hole and location. The hydraulic effects of the 10 drop-per-minute leak (when the system is pressurized) and seismic integrity based on pipe stress and UT results were considered in the interim disposition.

PROCEDURE A-C-28 Unit 1 Unit 2 Common

This administrative procedure for Preventive Maintenance was revised to permit documented instructions to be utilized in lieu of written implementing procedures, as appropriate to the circumstances, for performing PM tasks. This UFSAR change is consistent with LGS UFSAR Section 13.5.1.13 (Maintenance Procedures) and complies with ANSI STD N18.7-1976, Section 5.2.7: Maintenance and Modifications. This change affected a section of the UFSAR and is an overall enhancement to maintenance.

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PROCEDURE GP-3 Unit 1 Unit 2 Common

This procedure, "Normal Plant Shutdown," was revised to permit removal of the first and second layers of reactor well shield plugs before the reactor is in cold shutdown in advance of a refueling outage. The evaluation considered the impact of the potential consequences of accidents that could occur with the reactor well shield plugs not fully installed when the reactor is not in cold shutdown. The evaluation assumed that Reactor Enclosure Secondary Containment is operable, as modified by modification ECR 94-10694. This modification added the Refuel Floor Area, Zone III, into the outage unit's Reactor Enclosure Area, Zone I or Zone II. This change affected several sections of the UFSAR and is an overall enhancement to maintenance.

PROCEDURE GP-5 Unit 1 Unit 2 Common

This procedure was revised to incorporate a new Final Feedwater Temperature curve specific to Unit 2 Cycle 3. This new curve allowed for an additional 10°F of feedwater temperature reduction. The evaluation was supported by letters from GE addressing the Minimum Critical Power Ratio (MCPR) and transient analysis effects of an additional 10°F reduction. The GE review also included the effect on feedwater sparger duty cycles. This review and analysis by GE was performed for using the additional temperature reduction only during Cycle 3 on Unit 2. This change affected a section of the UFSAR and is an overall enhancement to operations.

PROCEDURE GP-6.1 Unit 1 Unit 2 Common

This procedure, "Shutdown Operations," was revised to permit opening selected secondary containment airlocks when secondary containment is not required to be operable. This will enhance equipment and personnel access to the Reactor Enclosure and Refuel Floor during the refueling outage. The evaluation summarized the potential hazards and compensatory measures for each door combination. This change affected a section of the UFSAR and is an overall enhancement to maintenance.

PROCEDURE MAT P00167-2 Unit 1 Unit 2 Common

This procedure involved the post modification testing of a portion of the ESW and RHRSW crosstie modification. During this test manual operator actions are taken credit for in order to maintain the ESW system operable. This is consistent with the guidance of Generic Letter 91-18.

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PROCEDURE S53.7.A Unit 1 Unit 2 Common

This new procedure permitted the alignment of fuel pool cooling for establishment of natural circulation as analyzed by calculation GE-NE-A0005873-12. The procedure had been previously approved as a special test written specifically for natural circulation operation during 1R05. This change affected a section of the UFSAR and is an overall enhancement to maintenance and operations.

PROCEDURE SP-147 Unit 1 Unit 2 Common

This test procedure provided for monitoring plant operation under increased Recirculation and Core Flow conditions up to 110% of rated conditions. The evaluation considered effects of vibration on small and large piping, possible small pipe breaks, and containment leakage as well as core performance concerns. The evaluation discussed the expected piping and vibration characteristics of any possible vibration and noise and the capability of the piping to withstand those characteristics. This test affected several sections of the UFSAR and did not involve an Unreviewed Safety Question.

PROCEDURE SP-150 Unit 1 Unit 2 Common

This procedure monitored the operation of the 1D RHR pump motor oil cooler temperatures while ESW cooling water to the pump was secured. The other Emergency Core Cooling System (ECCS) pumps were operable during this test. Constant operator monitoring occurred during the test. The ESW cooling water was required to be restored if oil temperatures began to rise. This test was intended to assist in determining if the RHR pumps could run without ESW cooling water flow to the motor oil cooler.

PROCEDURE SP-M-010 Unit 1 Unit 2 Common

This procedure involved replacement of the valve stem on the 2A Recirculation Pump Discharge Valve during 2R03. This change was considered an operation with the potential to drain the vessel and would be performed only with the Reactor cavity flooded and the spent fuel pool gates removed. A drain down of the fuel pool to the bottom of the fuel pool transfer canal would not result in uncovering spent fuel. This was a temporary condition.

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PROCEDURE Spec 8031-G-42 and UFSAR Unit 1 Unit 2 Common
Change L00646

This activity involved the revision of the LGS Site Flooding Study, Calculation and Specification 8031-G-42, Rev. 5. This evaluation addressed the revision to site flooding calculations for a postulated cooling tower basin failure or probable maximum precipitation event. The revision updated the calculations to account for revised site conditions and new flow paths primarily due to the Site Master Plan construction activities.

PROCEDURE ST-6-107-590-1,2 and T-103 and Unit 1 Unit 2 Common
T-103 Bases

The Daily Surveillance Logs (Surveillance Test (ST) procedures ST-6-107-590-1 R/65, and -2 R/31) and Transient Response Implementation Plan (TRIP) procedure T-103 R/7 and T-103 Bases R/8 were changed to reflect revised Maximum Normal Operating temperatures for the Steam Chase, Reactor Water Cleanup (RWCU) Regenerative Heat Exchanger Room, and RWCU Pump Rooms. These temperature values were revised based on operating data and evaluation of equipment limitations. The intent of the revisions is to avoid unnecessary entries into procedure T-103 when outside ambient air temperatures result in higher operating temperatures within the various rooms listed above. These changes affected a table in the UFSAR and are an overall enhancement to operations.

UFSAR CHANGE ECR 94-06897 Unit 1 Unit 2 Common

This ECR reviewed the commercial grade dedication plan for the concrete to be used in the construction of safety-related (passive) seismic Category I valve pits associated with the ESW and RHRSW systems. The valve pit's passive safety-related function is not adversely affected by the use of dedicated concrete.

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UFSAR CHANGE ECR 94-10882 Unit 1 _ Unit 2 _ Common x

This UFSAR change involved changing the Nuclear Review Board (NRB) responsibilities to include the review of a sampling of safety evaluations. This was based on 1) the noted UFSAR Section permits programs for reviews to take different forms and did not specify that the Independent Review body review all safety evaluations, 2) all safety evaluations require a "Peer" review to ensure completion and accuracy, 3) all safety evaluations are reviewed by PORC, and 4) the NRB continues to review proposed changes in procedures, proposed changes in the facility, or proposed tests and experiments which involve a change in the technical specifications or an unreviewed safety question.

This UFSAR change involved changing the audit frequency of specific Quality Assurance audit areas from 12 to 24 months. The basis for the annual audit frequencies were either recommendations in the form of the word "should", or are not specified by any frequency requirements. Audit areas were scheduled according to their safety significance and empirical performance data such as trends, events, and surveillance results. The allocation of assessment resources was based on performance data and thereby provided for timely assessment coverage of areas which warrant oversight attention. Assessment resources were not diluted by unnecessary calendar driven oversight of audit areas which were performing at a high and steady rate. On-going surveillances are conducted during the two-year audit frequency interval which provide for progressive assessment of functional performance.

UFSAR CHANGE ECR 94-11253 Unit 1 _ Unit 2 _ Common x

This UFSAR change revised the UFSAR to reflect that the Fuel oil storage tank is used to store #2 fuel oil for use in the Auxiliary Steam System boilers rather than #6 fuel oil as originally designed. However, prior to plant startup it was determined that utilizing the #6 fuel oil was not a viable alternative. The UFSAR was revised to delete reference to the use of #6 fuel oil.

UFSAR CHANGE ECR 94-11366 Unit 1 _ Unit 2 _ Common x

This UFSAR change removed references to the original "new fuel inspection stand" and "new fuel unloading station." These two components were replaced by new equipment which was installed as part of Modification 6190. The new equipment has been successfully used for the last three new fuel inspections at Limerick. Subsequently, the original equipment has been removed from the refueling floor and is no longer capable of being used. Since the components are no longer installed and were never required to perform a safety function prior to their removal, this change has no impact on safety as described in the UFSAR.

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UFSAR CHANGE ECR 94-12044 Unit 1 _ Unit 2 _ Common x

This UFSAR change was to allow for bypassing of the Rad Waste Floor Drain System Deep Bed Demineralizer. The Demineralizer shall be utilized when radioactivity levels in the Floor Drain system exceed 5% of the allowable Offsite Dose Calculation Manual (ODCM) limit.

UFSAR CHANGE ECR 95-00069 Unit 1 _ Unit 2 _ Common x

This UFSAR change evaluated changes to Nuclear Engineering Division (NED) as these changes affect NED support for LGS. These changes involved organization structure and responsibilities which resulted in movement of certain responsibilities to the site and permitted a reduction of NED staffing. These changes were essentially a continued refinement to the organization generally in keeping with the changes resulting from the Nuclear Effectiveness and Efficiency Design Study (NEEDS). The original changes brought about by NEEDS were the subject of a separate 10CFR50.59 Review approved October 18, 1993. The reasoning behind these changes is that support to the plant is now seen as focused in three main areas: Modifications, Technical Support, and Programs. Additionally, there are responsibilities transitioning from NED to the site of selected programmatic and non-programmatic work which involve embedded NED expertise. It is felt that these programs are sufficiently mature that this work can be transferred to the appropriate station groups.

UFSAR CHANGE ECR 95-00987 Unit 1 _ Unit 2 _ Common x

This UFSAR change evaluated changing the description of the Operations organization as a result of the implementation of the Equipment Operator position. The non-licensed operator descriptions were consolidated and no change in basic responsibilities occurred.

UFSAR CHANGE ECR 95-01615 Unit 1 x Unit 2 x Common _

This UFSAR change involved increasing the design basis response time of the RCIC system from 30 to 55 seconds. This change may help reduce unnecessary retesting of the RCIC and minimized the challenge to the RCIC overspeed trip due to governor control setup in order to meet conservative response times. The change or relaxation to the RCIC response time is part of a larger program called PERFORM, which has evaluated the relaxation of several ECCS requirements. The proposed change does not involve a change to the Technical Specifications, but does require a revision to the UFSAR. No physical changes are planned at this time.

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UFSAR CHANGE ECR 95-01886 Unit 1 Unit 2 Common

This UFSAR change involved relaxing Reactor Water Level 2 (L2) Trip Analytical Limit (AL). The L2 Analytical Limit was lowered by 12 inches from 469.5 to 457.5 inches above vessel zero. The change was only for the AL ; the Allowable Value (AV) and Nominal Trip Set Point (NTSP) were not changed. The change or relaxation to the AL is part of a larger program called PERFORM which has evaluated the relaxation of several ECCS requirements. The proposed change does not involve a change to the Technical Specifications, but does require a revision to the UFSAR. No physical changes are planned at this time.

UFSAR CHANGE ECR 95-01964 Unit 1 Unit 2 Common

This UFSAR change involved a clarification of the qualification requirements for the substitute Radiation Protection Manager (RPM). The UFSAR required the substitute to have a Bachelor's Degree in science or engineering which was more restrictive than the Tech Spec, UFSAR, and Reg. Guide 1.8 (1975) requirements for individuals holding the position of RPM. The change made requirements for a substitute for the RPM equal to those for RPM.

UFSAR CHANGE ECR 95-02436 Unit 1 Unit 2 Common

This UFSAR change involved the quality reclassification of the RHRSW Process Radiation Monitoring Pump Assemblies, 1C/1D and 2C/2D - P729, from safety related to non-safety related equipment. The unit specific RHRSW Process Radiation Monitoring Pumps (C/D) provide monitoring capability for detection of radiation levels in the RHR heat exchanger discharges. The RHRSW Process Radiation Monitors (C/D) alarm in the control room and automatically isolate the RHR heat exchangers on high radiation levels. The reclassification of the C/D RHRSW Process Radiation Pump assemblies to non-safety related does not affect the RHRSW Radiation Monitoring System in minimizing radiological releases to the environment because the principle monitoring function is performed by the A/B RHRSW Process Radiation Monitors. The RHRSW Process Radiation Monitor Pump Assemblies are not required for the safe shutdown of the plant and are not required to mitigate the consequences of an accident.

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UFSAR CHANGE L00599 Unit 1 Unit 2 Common

This UFSAR change evaluated a change to the description of the EDG. The UFSAR stated that each EDG will be operated on "an approximately weekly basis" to maintain an oil film on wearing surfaces. The change relaxes this commitment to monthly to be consistent with the Technical Specifications. Vendor concurrence with the change was obtained in a letter from PECO to COLTEC on May 5, 1993, and is based upon 1) all planned EDG starts are prelubed, 2) a slow-start and gradual load starting method is used whenever possible, 3) there has been past demonstration of successful dry start capability in the late 1980's, and 4) the unique Limerick skid design has the lube oil cooler low and in front of the skid and the lube oil filter horizontal on the deck to minimize the amount of drainback to the sump when the engine is shutdown.

UFSAR CHANGE L00625 Unit 1 Unit 2 Common

This UFSAR change evaluated a clarification of the UFSAR description of the EDG. Section 1.8 of the UFSAR which evaluates compliance with NRC Regulatory Guide 1.108 erroneously stated that the Limerick EDG surveillance system does not indicate which of the protective trips is activated first. This is known as annunciator "First Out" indication and is present on the Limerick local EDG annunciator panels. This change affected a section of the UFSAR and was a clarification only and no physical changes to the facility were involved.

UFSAR CHANGE L00665 Unit 1 Unit 2 Common

This UFSAR change evaluated a clarification of the UFSAR description of the EDG. The UFSAR erroneously stated that there were two thermocouples on the turbo charger combustion air discharge to the air coolers. The correct location for these thermocouples is on the exhaust manifold adapter on the turbo charger hot (exhaust) gas inlet on the turbine side of the device. The purpose of these thermocouples is to allow an evaluation of turbo charger performance. The UFSAR was revised to reflect the correct locations. This change affected a section of the UFSAR and was a clarification only and no physical changes to the facility were involved.

UFSAR CHANGE L00679 Unit 1 Unit 2 Common

This UFSAR change evaluated a clarification of the UFSAR description of the EDG. The UFSAR stated that the engine sump lubricating oil level is automatically maintained. In 1985, the automatic level controller was valved out and level is maintained manually using the engine dipstick and controlled by plant procedures. This change affected a section of the UFSAR and was a clarification only and no physical changes to the facility were involved.

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UFSAR CHANGE L00709 Unit 1 Unit 2 Common

This UFSAR change involved the elimination of the dissolved gas, particulate, and iodine sampling from the Post Accident Sampling System (PASS). These samples are not utilized in Limerick's post accident program for dose assessment, core damage estimates, or personnel access, and are therefore not required to meet NUREG 0737.

UFSAR CHANGE L00809 and ECR 94-05872 Unit 1 Unit 2 Common

This ECR and associated UFSAR change evaluated the use of a new control rod. GE has developed and manufactured a new type of control rod that reduces the susceptibility to irradiation assisted stress corrosion cracking (IASCC) and the overall weight of the control rod without reducing lifetime or nuclear performance. The new design is called a "Marathon Control Rod" and has significantly increased capabilities due to four (4) design improvements; 1) the function of the sheath and the absorber rods are performed by a structural tube configuration, which reduces weight, 2) segmented rods which reduce weight, 3) B₄C absorber is contained in capsules, therefore, reducing susceptibility to corrosion and B₄C migration, and 4) use of a new material for tube configuration which is highly resistant to IASCC.

UFSAR CHANGE L00830 Unit 1 Unit 2 Common

This UFSAR change involved revising the description of the NRB's role in providing an independent review and audit function for the Nuclear Generation Group. This change made the descriptions of the NRB's role common between Limerick and Peach Bottom where permitted by Technical Specifications.

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COMMITMENT REVISION Bulletin 90-01 Response Unit 1 Unit 2 Common

This commitment involved the elimination of extended span response checks for those Rosemount transmitters which have reached maturity. In PECO's response to Bulletin 90-01, Supplement 1, Loss of Fill Oil in Transmitters Manufactured by Rosemount, the transmitters which would be excluded from the enhanced monitoring program upon their reaching maturity were identified, since mature transmitters exhibit an acceptably low failure rate. PECO did commit, however, to continue performing extended span response checks for mature transmitters as part of the regularly scheduled surveillance.

Based on results to date, this commitment was changed so that the extended span response check would no longer be performed as part of regularly scheduled surveillance testing once a transmitter reached maturity. This in no way impacted the confidence for detecting the failure of mature transmitters, since the other items (procedure guidance, operator and technician awareness) remain in place. This affected a commitment to the NRC and is an overall enhancement to maintenance.