PHILADELPHIA ELECTRIC COMPANY

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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

March 25, 1985

Docket No. 50-352

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Denton:

The Limerick Generating Station Unit 1 is currently shut down performing maintenance and minor modifications directed toward enhancing and optimizing system performance. Since it appears that a full power license may not be issued until mid to late April, 1985, we plan to test operate the main turbine generator within the capability of our existing 5% power license when the reactor is returned to service. The operation of the main turbine generator at this time will permit us to identify potential problems associated with it and will help ensure a smooth startup test program beyond the 5% power limit.

The FSAR Section 14.2.-5 identifies several startup tests above 5% power that require the availability of the main turbine generator. Operation of the main turbine generator at this time will provide information regarding such variables as vibration and eccentricity, bearing metal and oil temperatures, oil system parameters, steam seal system performance, shell and rotor differential expansion, generator temperature monitoring, hydrogen purity, and hydrogen system monitoring. Observed inconsistencies during this low power operation can be investigated and resolved such that these discrepancies will not affect later operation above the 5% power limit.

Our present license limits reactor power to 5%. This limit is recognized as the steady state power limit which is not to be exceeded by any planned testing or other operations. Equipment failures or control failures associated with the recirculation

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system, feedwater system, or pressure control system could have resulted in momentary power spikes above the 5% power level in the past. By careful attention to detail no such power excursion has occurred.

With the main turbine generator in operation, no change in the above conditions would be expected since the turbine generator is merely substituted for the bypass valves as a steam flow path. No testing will be performed which results in a planned turbine trip, however, it should be recognized that a turbine trip may occur and result in a power spike. The probability of exceeding our 5% power license on an equipment failure with or without turbine generator in operation is not significantly different.

The operation of the main turbine generator within the 5% power license limit is not inconsistent with the FSAR and poses no additional hazard to the health and safety of the public.

We would appreciate your concurrence in our interpretation that operation of the main turbine generator within the steady state 5% license power limit is appropriate.

If you have any questions or need additional information, please don't hesitate to contact us.

Very truly yours,

cc: Dr. T. E. Murley, Administrator
Mr. J. T. Wiggins, Resident Inspector
See Service List

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Cole
Judge Christine N. Kohl
Judge Gary J. Edles
Judge Reginald L. Gotchy
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Atomic Safety & Licensing Appeal Panel
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