



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 112 AND 74 TO FACILITY OPERATING
LICENSE NOS. NPF-39 AND NPF-85
PHILADELPHIA ELECTRIC COMPANY
LIMERICK GENERATING STATION, UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated July 28, 1995, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TSs). The requested changes would delete the operability and surveillance requirements involving secondary containment differential pressure instrumentation. These changes are consistent with the guidelines contained in the Improved Standard Technical Specifications, General Electric Plants BWR/4 (NUREG-1433), issued September 28, 1992, and do not change the equipment configuration or operation.

2.0 EVALUATION

The licensee has requested to delete the following operability and surveillance requirements involving secondary containment differential pressure instrumentation for Units 1 and 2:

Table 3.3.2-1	(6f) (7e) (7f)
Table 3.3.2-2	(6f) (7e) (7f)
Table 3.3.2-3	(6f) (7e) (7f)
Table 4.3.2.1-1	(6f) (7e) (7f)
Table 3.6.3-1 Penetration 025	Isolation Signals U,T
Table 3.6.3-1 Penetration 026	Isolation Signals U,T
Table 3.6.3-1 Penetration 201A	Isolation Signals U,T
Table 3.6.3-1 Penetration 202	Isolation Signals U,T
Table 3.6.5.2.1-1 Zone I (Unit 1)	Isolation Signals U,T
Table 3.6.5.2.1-1 Zone II (Unit 2)	Isolation Signals U,T
Table 3.6.5.2.2-1 Zone III	Isolation Signals U,T

In addition, the licensee requested that Table Notation (c) of Table 3.3.2-1 for Units 1 and 2 be revised to delete reference to isolation signals 'U' and 'T' in support of the changes identified above.

The purpose of the containment isolation system is to prevent or limit the release of radioactive materials that may result from postulated accidents. For the primary containment, this is accomplished by providing isolation

barriers in all fluid lines that penetrate the primary containment. For the secondary containment, fission products which may leak into the secondary containment following a Loss of Coolant Accident (LOCA) or fuel handling accident are controlled by maintaining a negative pressure relative to the outside atmospheric pressure and filtering the fission products prior to release. The licensee monitors plant parameters (i.e., reactor vessel water level, primary containment pressure, system flows, room temperatures, safeguard bus voltages, and radiation levels) to identify conditions associated with a design basis accident, and to take appropriate actions to isolate primary containment, and to initiate the Standby Gas Treatment System (SGTS) and Reactor Enclosure Recirculation System (RERS) when pre-determined valves are exceeded.

When the reactor enclosure pressure is less than or equal to a negative 0.1-inch water gage, with respect to outside atmospheric pressure, a limited primary containment isolation signal and a secondary containment isolation signal are initiated by the Outside Atmosphere To Reactor Enclosure Delta Pressure-Low trip function in anticipation of a potential design basis accident. Further, the licensee takes no credit for the operation of these trip functions in any design basis accidents evaluated in the Updated Final Safety Analysis Report (UFSAR).

The licensee's justification for deleting the TS requirements for operability and surveillance of the above trip functions is based on the following reasons: (1) no credit is taken for the operation of the Outside Atmosphere To Reactor Enclosure Delta Pressure-Low and the Outside Atmosphere To Refueling Area Delta Pressure-Low trip functions in any design basis accidents evaluated in the UFSAR, and (2) an adequate number of plant parameters are monitored to detect a design basis accident and to initiate appropriate actions. The licensee also stated that all the other TS operability and surveillance requirements associated with the primary containment isolation and the secondary containment remain unchanged. Further, the design and operation of the secondary containment differential pressure automatic isolation instrumentation also remain unchanged.

The proposed amendment does not change the design, function, or operation of any plant components or safety-related systems including the secondary containment differential pressure automatic isolation instrumentation, primary containment, secondary containment, SGTS, RERS, Reactor Enclosure heating, ventilation, and air conditioning (HVAC), or Refueling Area HVAC. No changes are made to the separation, redundancy, qualification, quality assurance or fire protection requirements for the associated components and systems, nor are there any new failure modes created, and no equipment important to safety is adversely affected by this change. The licensee has further stated that the secondary containment differential pressure instrumentation will continue to initiate the appropriate actions if reactor building/refueling area differential pressure cannot be maintained. If differential pressure cannot be restored within the associated time delay, following a Loss-of-Offsite Power, the appropriate containment isolation, SGTS and RERS initiation actions will still occur. Based on the evaluation of the licensee's amendment, the staff concludes that the deletion to the operability and surveillance

requirements involving secondary containment differential pressure instrumentation is in accordance with NUREG-1433, and acceptable to the staff.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (60 FR 49942). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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