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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 113 AND 75 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 (PECO or the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TSs). The requested changes would revise TSs Table 4.3.1.1-1, "Reactor Protection System Instrumentation Surveillance Requirements," to reflect changes the surveillance test frequency requirements for various Reactor Protection System (RPS) instrumentation.

2.0 EVALUATION

The licensee has proposed changes to TS Table 4.3.1.1-1, "Reactor Protection System Instrumentation Surveillance Requirements," that reflect changes to the surveillance test frequency requirements for various Reactor Protection System (RPS) instrumentation, as follows:

(a) Delete the channel check and functional test for Intermediate Range Monitor (IRM) and Average Power Range Monitor (APRM) prior to startup, in accordance with Improved Standard Technical Specifications (STS), NUREG-1433, issued September 28, 1992.

(b) Change the required frequency of the APRM functional test from weekly to quarterly for the Neutron Flux - Upscale, Setdown function, based on documented plant instrumentation performance and reliability.

The TS change will provide to the licensee the flexibility to maintain the Intermediate Range Monitor (IRM) and the Average Power Range Monitor (APRM) instrumentation surveillance tests at frequencies already shown to be acceptable, while minimizing delays in plant startup due to requirements that are bounded by those imposed during normal operation. Note (c) of Table 4.3.1.1-1 is also being deleted as a result of the proposed changes.

The changes to the surveillance test frequency requirements for various RPS instrumentation, such as IRM and APRM, do not involve a physical change in the configuration, setpoints, or operation of any safety-related instrumentation. Therefore, the changes do not modify the manner in which the associated IRM and APRM instrumentation carry out the scram functions.

The deletion of requirements to perform the channel check and functional test for IRM and APRM prior to startup is in accordance with the Improved STS. The reliability of each tested function is confirmed by the fact that the normal surveillance frequency specified in the TSs for that function, remains unchanged and it is greater than, or equal to the startup surveillance interval associated with that function.

The change to the required frequency of the APRM functional test from weekly to quarterly for the Neutron Flux-Upscale, Setdown function is based on APRM instrumentation reliability confirmed by plant operating experience at LGS Units 1 and 2. The setpoint data was collected for each APRM channel, for RPS and Control Rod Block Upscale Setdown surveillance testing performed since August 1992, until present. The results of the quarterly tests confirmed that the APRM Upscale Setdown function has over 2.5 years of performance in Operational Condition 1 (Power Operation) without any failures, thus being extremely reliable. Also, the proposed TS changes do not affect existing accident analyses or design assumptions, nor do they impact any safety limits of the plant.

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 49944). 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.

Principal Contributor: F. Rinaldi

Date: February 14,1996