

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION
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GRAHAM M. LEITCH
VICE PRESIDENT
LIMERICK GENERATING STATION

July 16, 1992

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
Initial Systematic Assessment of Licensee Performance
Report Nos. 50-352/90-99 and 50-353/90-99
Submittal of Written Comments

Gentlemen:

NRC letter dated June 19, 1991, transmitted the initial Systematic Assessment of Licensee Performance (SALP) for Limerick Generating Station (LGS), Units 1 and 2 for the period October 16, 1990 through March 14, 1992. A meeting was subsequently held with the NRC on June 26, 1992, during which we presented our plans to improve our performance. This letter provides our written comments on the initial SALP Report as requested by the June 19, 1992 NRC letter.

We concur with the SALP Board's assessment of activities at LGS. As discussed at the June 26, 1992 meeting, actions have been and are being taken to address the weaknesses discussed in the initial SALP report.

We would like to offer one clarification. On page 10 of the report there is a discussion regarding our "quality-to-the-line" program. This program has been instituted in the maintenance area with the HCU, valve repacking and MCC maintenance. We are currently in the process of instituting this verification program into the EDG maintenance procedures.

If you have any questions or need additional information, please contact us.

Very truly yours,



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