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SEP 21 1984

V. S. BOYER
SR. VICE PRESIDENT
NUCLEAR POWER

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docket Nos.: 50-352
50-353

Subject: Limerick Generating Station, Units 1 and 2
Request for Exemption from 10CFR50, Appendix A,
GDC-61

References: (1) Letter, J. S. Kemper to A. Schwencer,
dated 7/26/84.
(2) Letter, J. S. Kemper to A. Schwencer,
dated 8/13/84.

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

Pursuant to 10CFR50.12, Philadelphia Electric Company hereby requests an exemption from the requirement of 10CFR50, Appendix A, General Design Criterion (GDC) 61 as it relates to the filtering of radioactive gases in the refueling area under postulated accident conditions.

The standby gas treatment system (SGTS) reduces halogen and particulate concentrations in gases potentially present in the refueling area following a postulated fuel handling accident before the gases are discharged to the environment. The SGTS will not be connected to the refueling area prior to fuel load. FSAR Section 6.5.1(a) notes our commitment to connect the refueling area to the SGTS prior to the first refueling outage.

In accordance with our reference (1) letter, the following commitments are made until such time as the SGTS is connected to the refueling area:

- a. Operations involving removal of the primary containment and RPV heads after initial criticality are prohibited without specific, prior NRC approval.

What halogens and particulates?
how much reduction in halogens and particulates?

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- b. The handling of any loads (other than the RPV head, dryer or separator) over irradiated fuel will be carried out in accordance with the single failure criteria of NUREG-0612. As stated in the Limerick heavy loads report, transmitted by Reference (2), a drop of the RPV head, dryer, or separator will not cause any fuel damage.
- c. Operations involving handling and storage of irradiated fuel will not be undertaken.

These commitments effectively preclude the release of radioactivity to the refueling area environment prior to the time that the SGTS has been connected. Therefore, the "...appropriate containment, confinement, and filtering systems..." called for by GDC-61 will not be required to be available by plant conditions until the SGTS has been connected.

Based upon the foregoing, we have concluded that granting the requested exemption will not endanger life or property or the common defense and security and is otherwise in the public interest. Further, delaying the operation of Limerick until the SGTS services the refueling area is unwarranted, unnecessary, and not in the public interest. For these reasons, Philadelphia Electric Company requests that the Commission issue an exemption to GDC-61 that would allow the SGTS to be connected to the refueling area prior to the first refueling outage. An affidavit in support of this request is attached hereto.

Sincerely,

V. S. Boyer

*On what basis
does Mr. Boyer
state that exemption
from GDC 61 is
in the public interest?*

JHA/gra/09188401

cc: See Attached Service List