PHILADELPHIA ELECTRIC COMPANY 2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA, PA. 19101 V. S. BOYER 12151 841-4500 SR. VICE PRESIDENT NUCLEAR POWER SEP 21 1984 Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555 Subject: Limerick Generating Station, Units 1 & 2, Docket Nos. 50-352 & 50-353 Request for Exemption from 10CFR50, Appendix A, GDC 56 Dear Mr. Denton: The Limerick Safety Evaluation Report (NUREG-0951, Supplement 1) concludes that the applicant's design of the containment isolation provisions for the hydrogen recombiners "... provided an adequate basis for justifying operation of Limerick Unit 1 through the first cycle. Implementation of the staff position requiring the addition of an (additional) automatic isolation valve in each of the hydrogen recombiner lines penetrating the containment should be completed before startup after the first refueling outage." The SER further states that this represents a justifiable temporary exemption from 10CFR50, Appendix A, General Design Criterion 56. The SER also states that "... the NRC staff finds the proposed deviation from the requirements of SRP 6.2.4 (for the Drywell Chilled Water and Reactor Enclosure Cooling Water isolation valves) during the first cycle of operation is acceptable." This deviation also represents a justifiable temporary exemption from 10CFR50, Appendix A, General Design Criteria 56. Based upon the foregoing it is requested that, in accordance with Section 50.12 of the Commission's regulations, the general conclusions of the SER be confirmed by the issuance of specific exemptions to the requirements of 10CFR50, Appendix A, General Design Criterion 56. An affidavit in support of this request is attached hereto. Very truly yours, 7 8 Boyen DRH/amv/09178403 Attachment Copy to: See Attached Service List B410260093 841020 PDR ADDCK 05000352