

PHILADELPHIA ELECTRIC COMPANY

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JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

OCT 25 1984

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

Subject: Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353
Request for Exemption from 10CFR50,
Appendix A, GDC 19

Reference: J. S. Kemper (PECO) letter to A. Schwencer (NRC)
dated July 18, 1984.

File: GOVT 1-1 (NRC)

Dear Mr. Denton:

Pursuant to 10CFR50.12, Philadelphia Electric Company hereby requests an exemption from the requirement of 10CFR50, Appendix A, General Design Criterion 19 as it relates to the provision of a capability to achieve hot and subsequent cold shutdown from outside the control room.

A remote safe shutdown panel room is provided outside the control room in order to achieve the objectives of GDC 19. As interpreted in Standard Review Plan (NUREG-0800) Section 7.4, this GDC requires that the capability to achieve such shutdown conditions remotely should also be redundant. PECO has committed, via the reference letter, to provide this redundant remote shutdown capability by making procedural and hardware changes (which allow for the single failure of systems or components controlled from the Remote Shutdown Panel without the need for jumpering or rewiring circuits). This capability will be provided prior to starting up the plant at the conclusion of the first refueling outage. Information on the changes to be made at the first refueling outage will be provided to the NRC staff prior to exceeding 5% power. PECO additionally commits to providing a redundant remote shutdown capability using procedures and existing equipment as detailed below prior to exceeding 5% power.

The absence of this redundant remote shutdown capability will not endanger life or property for the following reasons:

1. A remote shutdown capability is needed only in the event that the main control room becomes either inoperative or uninhabitable.

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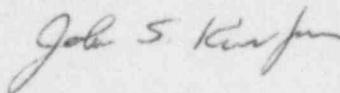
2. The provision of redundant safe shutdown capabilities within the control room makes it highly unlikely that all such available methods in the control room will be simultaneously unavailable. The likelihood that this unavailability would occur during operation before exceeding 5% power is even more unlikely.
3. The likelihood that either internal or external events will render the control room uninhabitable is very small, given the presence of systems and procedures to detect and protect the control room against such events.
4. The existing Remote Shutdown Panel room is located on a separate floor from the main control room and separated by barriers which protect the remote room from the hazards which would affect the main control room. The likelihood that the Remote Shutdown Systems would not function as designed is small. When combined with the likelihoods discussed in 2 and 3 above, the likelihood that these 3 events would combine prior to exceeding 5% power is even more remote.
5. Procedures will be available to provide this redundant remote shutdown capability using equipment presently installed at the plant in conjunction with temporary jumpers. These procedures will be reviewed, approved and in place prior to exceeding 5% power. Prior to exceeding 5% power, only minimal decay heat requiring removal will exist. As a result substantial time will be available to take mitigative measures.

The requested exemption does not impact the common defense and security. Only the potential impact on public health and safety is at issue.

The requested exemption is in the public interest in that any delay in commencement of low power testing and power ascension would cause a delay in the attainment of commercial operation (and subsequent increase in ratepayer's cost) and since, as shown above, the health and safety of the public will be adequately protected.

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. Therefore, Philadelphia Electric Company requests that the Commission issue an exemption to GDC 19. An affidavit in support of this request is attached hereto.

Sincerely,



JTR/gra/10258407

cc: See Attached Service List

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF PHILADELPHIA : ss.

J. S. Kemper, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the applicant herein; that he has reviewed the foregoing request, pursuant to 10CFR50.12 for certain specific exemptions to the requirements of Appendix A and knows the contents thereof; and that the matters and statements set forth therein are true and correct to the best of his knowledge, information and belief.

John S. Kemper
Vice President

Subscribed and sworn to
before me on the 25th day
of October 1984.

Patricia D. Scholl
Notary Public

PATRICIA D. SCHOLL
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 10, 1986

cc: Judge Helen F. Hoyt
Judge Jerry Harbour
Judge Richard F. Coie
Judge Christine N. Kohl
Judge Gary J. Edles
Judge Reginald L. Gotchy
Troy B. Conner, Jr., Esq.
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Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
Docket & Service Section
Mr. James Wiggins
Mr. Timothy R. S. Campbell