PECO NUCLEAR

A UNIT OF PECO ENERGY

PECO Energy Company
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April 25, 1996

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
Technical Specifications Change Request No. 95-08-0
Relocation of Traversing In-Core Probe Limiting Condition For Operation

Gentlemen:

PECO Energy Company (PECO) is submitting Technical Specifications (TS) Change Request No. 95-08-0, in accordance with 10 CFR 50.90, requesting a change to TS (i.e., Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2.

The purpose of the proposed TS changes is to relocate the TS Traversing In-Core Probe (TIP) System Limiting Condition For Operation (LCO) 3/4.3.7.7 and its Bases 3/4.3.7.7, and modify Note (f) of TS Table 4.3.1.1-1 "Reactor Protection System Instrumentation Surveillance Requirements" to remove its reference to the TIP System in accordance with NRC NUREG-1433 "Standard Technical Specifications, General Electric Plants, BWR/4".

Information supporting this TS Change Request is contained in Attachment 1 to this letter, and copies of the marked-up TS pages for the LGS, Units 1 and 2, TS are contained in Attachment 2. The TS change information is being submitted under affirmation, and the required affidavit is enclosed.

We request that if approved, the TS Change be issued by June 10, 1996, and become effective within 30 days of issuance.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

M. C. Kray for

G. A. Hunger, Jr.,
Director-Licensing

Enclosure, Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/enclosure, attachments)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/enclosure, attachments)
R. R. Janati, PA Bureau of Radiation Protection (w/enclosure, attachments)

A001

COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

D. B. Fetters, being first duly sworn, deposes and says: That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the enclosed Technical Specifications Change Request No. 95-08-0 "Relocation of Traversing In-Core Probe System Limiting Condition For Operation" for Limerick Generating Station, Unit 1 and Unit 2, Facility Operating License Nos. NPF-39 and NPF-85, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

Vice President

Subscribed and sworn to
before me this 25th day
of April 1996.

Notary Public

Notarial Seal
Mary Lou Skrocki, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires May 17, 1999
Member, Pennsylvania Association of Notaries

ATTACHMENT 1

LIMERICK GENERATING STATION

UNITS 1 AND 2

Docket Nos.
50-352
50-353

License Nos.
NPF-39
NPF-85

"Relocation of Traversing In-Core Probe System Limiting Conditions For Operation"

Information Supporting Changes - 3 pages

DISCUSSION AND DESCRIPTION OF THE PROPOSED CHANGES

PECO Energy Company (PECO Energy) is requesting Technical Specifications (TS) changes which will relocate TS Requirements 3.3.7.7 and 4.3.7.7, "Traversing In-Core Probe (TIP) System" and its Bases 3/4.3.7.7, and modify Note (f) of TS Table 4.3.1.1-1 "Reactor Protection System Instrumentation Surveillance Requirements" in accordance with NRC NUREG-1433 "Standard Technical Specifications, General Electric Plants, BWR/4".

The purpose of this TS Change Request is to remove the TIP system requirements, and limiting conditions for operation (LCO) from TS Sections 3.3.7.7, 4.3.7.7 and Bases 3/4.3.7.7 and relocate them (in their entirety) to the LGS Technical Requirements Manual (TRM) in accordance with NUREG-1433. In addition, the TIP system is detailed as the method for performing Local Power Range Monitor (LPRM) calibrations as described in Note (f) of TS Table 4.3.1.1-1 and will be modified in accordance with NUREG- 1433. Both the TRM and plant procedure governing surveillances are subject to the change control provisions described in the Administrative Controls Section of TS. Therefore, removal of the TIP LCO and surveillance requirements from TS will permit administrative control of future changes to the relocated items without processing a licensing amendment.

TS SAFETY ASSESSMENT

This activity does not alter existing TS requirements or those components to which they apply. The removed requirements will be located in a licensee controlled document (i.e., TRM) and any future changes will be subject to the requirements specified in the Administrative Controls Section of TS in accordance with the provisions of 10CFR50.59.

The Updated Final Safety Analysis Report (UFSAR) section 7.7. "Control Systems Not Required For Safety" and UFSAR section 7.7.1.6.3 describe the TIP system as an operational system which has no safety function. The system allows calibration of LPRM signals by correlating TIP signals to LPRM signals as the TIP is positioned in various radial and axial locations in the core. The TIP system has no safety setpoints. Other TS TIP requirements (e.g., TIP shear valve) not relevant to LCO 3.3.7.7 are unaffected by this change.

The NRC guidance provided in NUREG 1433 for relocated requirements is based on the NRC interim policy statement as documented in the General Electric Topical Report NEDO-31466, "Technical Specification Screening Criteria Application and Risk Assessment" and NRC review of this report in an NRC letter dated May 9, 1988. The NRC May 9, 1988 letter concluded that the TIP LCO may be relocated. In addition, this proposal for relocation of LGS TIP TS requirements is based on the application of the NRC Final Policy Statement noticed in the Federal Register on July 22, 1993. The 1993 Final Policy Statement allows for "line item improvements", and delineated four criteria whereby LCOs being considered for relocation which do not meet any of the criteria may be removed from TS and relocated to licensee controlled documents. The criteria are as follows.

Criteria 1 - Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criteria 2 - A process variable, design feature, or operating restriction that is an initial condition of a DBA or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criteria 3 - A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a DBA or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criteria 4 - A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Based on the four criteria, we have concluded that the LGS TIP System LCO is not used to prevent degradation of the reactor coolant boundary, not a condition of a DBA or transient analysis that is based upon the integrity of the fission product barrier, not a portion of the primary success path of a safety sequence analysis, and has not been shown to be significant to public health and safety.

In addition to the criteria contained in the NRC Policy Statement, the proposed changes to relocate TS 3/4.3.7.7 LCO and eliminate the TIP system details of Note (f) of TS Table 4.3.1.1-1 are in accordance with 10 CFR 50.36 "Technical Specification". The relocated and removed information was determined not to be required to obviate the threat to the public health and safety.

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

We have concluded that the proposed changes to the Limerick Generating Station (LGS) Unit 1 and Unit 2 TS, which will relocate the Traversing In-Core Probe (TIP) LCO (3.3.7.7 and 4.3.7.7) from TS to the TRM, and the modification of Table 4.3.1.1-1 Note (f) does not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

1. <u>The proposed TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.</u>

   The proposed changes will relocate requirements from TS to a licensee controlled document (i.e., TRM) and delete surveillance details pertaining to the TIP system which are already contained in licensee controlled documents. The relocated requirements will be retained in licensee controlled documents which will be maintained under the requirements of TS Administrative Controls Section 6.0 and the provisions of 10CFR50.59. Since any changes to licensee controlled documents are required to be evaluated per 10CFR50.59, no increase (significant or insignificant) in the probability or consequences of an accident previously evaluated will be allowed.

   In addition, these proposed changes will not affect any equipment important to safety, in structure or operation. These changes will not alter operation of process variables, structures, systems, or components as described in the safety analysis report and licensing basis. The changes will not increase the probability or consequences of occurrence of a malfunction of equipment important to safety previously evaluated in the SAR.

2. <u>The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.</u>

   The proposed changes will not alter the plant configuration or change the methods governing normal plant operation. The changes will not impose different operating requirements and adequate control of information will be retained. The changes will not alter assumptions made in the safety analysis report and licensing basis. Since the proposed changes cannot cause an accident, and the plant response to the design basis events is unchanged, the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. <u>The proposed TS changes do not involve a significant reduction in a margin of safety.</u>

   The proposed changes to relocate requirements from TS to a licensee controlled document and modify surveillance details pertaining to the TIP system which are already contained in other licensee controlled documents have been performed under the

guidance of NRC NUREG-1433, and the NRC Final Policy Statement noticed in the Federal Register on July 22, 1993 "Finai Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors." PECO Energy has concluded that the TIP LCO and surveillance details do not meet any of the four criteria delineated in the NRC's Policy Statement and therefore, may be removed from TS. The relocated requirements will be retained in licensee controlled documents which will be maintained under the requirements of TS Administrative Controls Section 6.0 and the provisions of 10CFR50.59.

The existing requirements for NRC review and approval of revisions (in accordance with 10 CFR 50.90), pertaining to the details and requirements proposed for relocation, do not have a specific margin of safety upon which to evaluate. However, since the proposed changes are consistent with the BWR improved Standard Technical Specifications (NUREG-1433, approved by the NRC Staff) and the change controls for proposed relocated requirements provide an equivalent level of regulatory authority, revising the TS to reflect the approved level of detail and requirements ensures no reduction in the margin of safety.

These changes will not reduce the margin of safety since they have no impact on any safety analysis assumptions. Since any future changes to the removed TIP System requirements will be evaluated under the requirements of 10CFR50.59, no reduction (significant or insignificant) in a margin of safety will be allowed. Therefore, the proposed TS changes do not involve a significant reduction in a margin of safety.

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

An Environmental Assessment is not required for the Technical Specifications changes proposed by this request because the requested changes to the LGS, Units 1 and 2, TS conform to the criteria for "actions eligible for categorical exclusion," as specified in 10 CFR 51.22(c)(9). The requested TS changes will have no impact on the environment. The proposed TS changes do not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. In addition, the proposed TS changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

CONCLUSION

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the LGS Units 1 and 2 TS, and have concluded that the changes do not involve an unreviewed safety question, and will not endanger the health and safety of the public.