



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAR 19 1985

Docket Nos. 50-352/353

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - PRELIMINARY STAFF REVIEW OF
GENERIC LETTER 83-28 RESPONSES, LIMERICK GENERATING STATION

The staff has completed a preliminary review to assess the completeness and adequacy of applicant/licensee responses to Generic Letter 83-28 Items 2.1, 2.2, 3.1.3, 3.2.3, 4.4 and 4.5. For Limerick, your responses were found to be incomplete for Items 2.1, 2.2.1, 2.2.2, 3.1.3, 3.2.3 and 4.5.3. Brief descriptions of the deficiencies are provided as guidelines for corrective action in the enclosed request for additional information. Efforts by Owners Groups, INPO and NSSS vendors have been or are being made to produce generic responses that may be useful in meeting the requirements of Generic Letter 83-28 Items 2.1, 2.2.1, 2.2.2 and 4.5.3. You may wish to contact these organizations regarding the applicability of such generic responses to your facility.

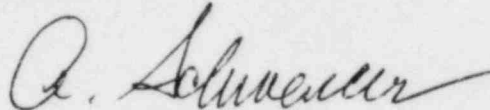
In order to preserve our present review schedule, the staff requests that you submit for review the supplementary information identified for Items 2.1, 2.2.1, 2.2.2, 3.1.3 and 3.2.3 within 60 days and for Item 4.5.3 within 90 days. If you intend to formally endorse the BWR Owners Group response to Item 4.5.3 (NEDC-30844), please advise us within 60 days. Your plant specific response to Item 4.5.3 should then be provided within 90 days after the NRC completes its review and issues its evaluation of NEDC-30844. We request your cooperation in meeting this schedule.

This request for additional information was approved by the Office of Management and Budget under clearance number 3150-0011 which expires April

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30, 1985. Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management Room 3208, New Executive Office Building, Washington, D.C. 20503.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. Schwencer".

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

cc: See next page

30, 1985. Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management Room 3208, New Executive Office Building, Washington, D.C. 20503.

Sincerely,


Original signed by:

A. Schwencer, Chief
Licensing Branch No. 2
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cc: See next page

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LIMERICK

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LIMERICK 1&2:

Item 2.1 (part 1) - Incomplete

Licensee needs to verify that safety related RTS components are designated as such on all drawings, documents, and in information handling systems.

Item 2.1 (part 2) - Incomplete

Licensee needs to submit a description of a program to establish and maintain an interface between all vendors of safety-related RTS components and the licensee. Information submitted shall describe how the program assures that vendor technical information is kept current, complete and controlled throughout the plant life and how the program will be implemented at Limerick 1&2.

Item 2.2.1 - Incomplete

The licensee needs to respond to sub-item 6 regarding classification of equipment important to safety.

Item 2.2.2 - Incomplete

Licensee needs to describe their program for establishing and maintaining an interface with all vendors of safety-related equipment that assures that vendor technical information is kept current, complete, and controlled over the life of the plant. If the licensee plans to implement the recommendations of NUTAC, they should note that the staff found the NUTAC program fails to address the establishment and maintenance of an interface between licensee and all vendors of safety-related equipment and act to provide the needed information. Where maintenance or test work is performed by other than licensee personnel, the division of responsibility between licensee and vendor for control of procedures and maintenance instructions shall be described.

Items 3.1.3 and 3.2.3 - Incomplete

Licensee needs to state if they have found any post-maintenance testing requirements for either RTS components or other safety-related equipment that may degrade safety. If any such are identified, the licensee shall describe actions to be taken including submitting needed Technical Specification changes.

Item 4.5.3 - Incomplete

Licensee needs to present the results of their study of existing or proposed intervals for on-line testing of the reactor trip system. Such studies shall consider each of the concerns expressed in sub-items 4.5.3.1 through 4.5.3.5 of the generic letter, show how the intervals result in high reactor trip system availability, and presents any resulting Technical Specification changes for staff review.

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specification surveillance requirements. The licensee needs to address this conclusion.