



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

October 5, 1992

Docket Nos. 50-353

Mr. George J. Beck
Manager-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: REQUEST FOR TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL
SPECIFICATION (TS) 4.6.2.3 FOR LIMERICK GENERATING STATION, UNIT 2

This letter confirms that on October 1, 1992, I orally granted your request to waive compliance from TS 4.6.2.3 as described in your follow-up letter dated October 2, 1992. The waiver was requested to suspend surveillance requirement (SR) 4.6.2.3 which requires that the suppression pool cooling mode of the Residual Heat Removal (RHR) system be demonstrated operable by verifying that each of the required RHR pumps develop a flow of at least 10,000 gpm on recirculation flow through the RHR heat exchanger, the suppression pool and the full flow test line.

On October 1, 1992, you determined during a post maintenance test that the 2B RHR pump was delivering only 5,800 gpm through the 2B RHR heat exchanger. You also determined that with concurrent leakage flow through the 2B RHR heat exchanger bypass line, the 2B RHR pump was able to deliver at least 10,000 gpm total recirculation flow.

On August 11, 1992, you applied for a TS amendment to clarify the requirements of 4.6.2.3 to confirm that the intent of the SR was to verify RHR pump performance in the suppression pool cooling mode of operation. In your submittal, you presented an analysis that concluded that the intent of the SR was to verify performance of the pump rather than heat transfer capability of the heat exchanger. That submittal is currently under staff review. In your waiver request, you propose to use the modified surveillance requirement 4.6.2.3 as presented in your August 11, 1992 submittal until the staff completes its review of the proposed amendment.

The proposed surveillance requirement states that the suppression pool cooling mode of the RHR system shall be demonstrated operable by verifying that each of the required RHR pumps develop a flow of at least 10,000 gpm on recirculation flow through the flow path including the RHR heat exchanger and its associated closed bypass valve, the suppression pool and the full flow test line.

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In an additional letter dated October 5, 1992, you addressed the safety significance of leakage flow through the heat exchanger bypass line. In that letter, you summarized the design factors considered in calculating what minimum RHR heat exchanger flow is required to remove the design heat load. The staff concludes that you have adequately considered the impact of increased bypass valve leakage flow in requesting the waiver.

After careful consideration of your request, the NRC has determined that a waiver of the existing TS requirement 4.6.2.3 would have negligible effect on plant safety in light of the implementation of the pending modified SR acceptance criteria. Thus, the action requirements of TS 3.6.2.3 need not be invoked for inability to meet the existing acceptance criteria.

The waiver, which we orally granted at 7:00 p.m. on October 1, 1992, is to remain in effect until the NRC completes processing of your August 11, 1992 amendment request.

Sincerely,

/s/

Jose A. Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. George J. Beck

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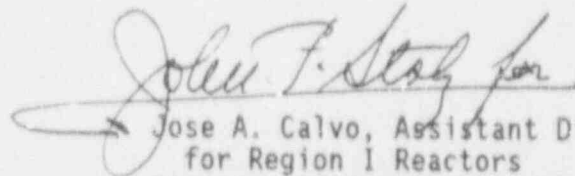
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Sincerely,



Jose A. Calvo, Assistant Director
for Region I Reactors
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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Limerick Generating Station,
Units 1 & 2

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