

PHILADELPHIA ELECTRIC COMPANY

10CFR50.90

NUCLEAR GROUP HEADQUARTERS

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January 12, 1993

NUCLEAR SERVICES DEPARTMENT

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
Incorporation of Changes Requested by the NRC

Gentlemen:

Our letter dated April 3, 1992, submitted Technical Specifications (TS) Change Request No. 90-20-0. That submittal requested that the TS Surveillance Requirements (SRs) for the Standby Liquid Control (SLC) system be changed to: 1) use the daily check of the SLC system pump suction piping temperature to verify system operability, rather than verifying heat tracing operability; 2) verify that the SLC system piping is not blocked by pumping the SLC system solution from the storage tank to a test drum, rather than to the test tank; and 3) require only one SLC storage tank heater to be operable for system operability, rather than the two heaters that are currently required.

The NRC responded to our April 3, 1992 TS Change Request by letter dated July 16, 1992, and requested that we consider substituting the pertinent sections of the SLC system requirements in the draft improved Standard TS (STS) (i.e., NUREG-1433). As stated in the July 16, 1992 NRC letter, substitution of the pertinent SRs specified in the draft improved STS would provide more flexibility with respect to verifying system operability since the STS requirements focus on the parameters important to safety, such as verifying that the temperature of the sodium pentaborate solution is above the point where it would precipitate out of solution, rather than the various means of achieving this result. In keeping with this focus, the STS does not contain SRs for the heat tracing or storage tank heaters.

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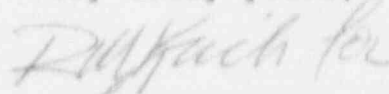
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Because of the clear benefits that would result from adopting the pertinent STS SRs, we agreed to the NRC requested substitution. Accordingly, we re-evaluated the incorporation of the pertinent STS SRs into our April 3, 1992 Change Request, and determined that our original conclusions with respect to the Significant Hazards Consideration of the proposed changes remained valid. Therefore, this letter submits the requested substitution of the pertinent STS SLC system SRs to replace the proposed changes in our April 3, 1992 Change Request.

Information supporting our conclusion that substitution of the pertinent STS SRs in place of our originally proposed changes is bounded by our original consideration of significant hazards is contained in Attachment 1 to this letter. The proposed replacement pages for the LGS, Unit 1 and Unit 2 TS are contained in Attachment 2. We request that, if approved, the Amendments be issued by February 5, 1993, and be immediately effective, in order to take advantage of the STS improvements during the second Unit 2 refueling outage scheduled to begin on January 23, 1993. The ability to use the STS SRs for establishing and maintaining the SLC system operability will be a substantial benefit with respect to the outage schedule.

If you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,



G. J. Beck, Manager
Licensing Section

GJB:en
Attachments

cc: T.T. Martin, Administrator, Region I, USNRC (w/attachments)
T.J. Kenny, USNRC, Senior Resident Inspector, LGS
(w/attachments)
W.P. Dornsife, Commonwealth of Pennsylvania (w/attachments)

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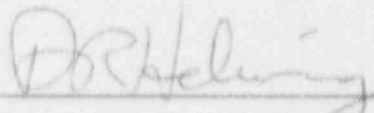
COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF CHESTER :

D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; the Applicant herein; that he has read the foregoing revised Application for Amendments to Facility Operating License Nos. NPF-39 and NPF-85 (Technical Specifications Change Request No. 90-20, Revision 1) to change the Standby Liquid Control system surveillance requirements, 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 15th day
of January 1993.



Notary Public

Notarial Seal
Dolores A. Cioran, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 24, 1995

ATTACHMENT 1

LIMERICK GENERATING STATION
UNITS 1 AND 2

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

REVISED TECHNICAL SPECIFICATIONS CHANGE REQUEST

No. 90-20-0, Revision 1

"Revision of Standby Liquid Control
Surveillance Requirements"

Supporting Information for Changes - 4 pages

This revised Technical Specifications Change Request substitutes the pertinent Standby Liquid Control (SLC) system Surveillance Requirements (SRs) from the draft improved Standard TS (STS) (i.e., NUREG-1433) in place of the changes proposed in our letter dated April 3, 1992. This substitution was requested by the NRC in its letter dated July 16, 1992. This substitution of the STS SRs results in the following proposed changes.

- 1) Allow the flexibility in the method(s) used to verify that the heat traced SLC system piping is unblocked rather than specifying a test flow path.
- 2) Delete the requirement to maintain both of the SLC system storage tank heaters operable, since operability of the SLC system is based in part on the temperature of the sodium pentaborate solution in the SLC system storage tank rather than the method used to achieve a particular temperature (i.e., verifying operability of the tank heaters).
- 3) Clarifications with respect to when and the period within which certain SRs are to be performed.

A description of the proposed TS changes, and a discussion of applicability of the information supporting a finding of No Significant Hazards Consideration and information supporting an Environment Assessment provided in our April 3, 1992 Change Request to the revised proposed TS changes, are provided below.

We request that, if approved, the Amendments to the Limerick Generating Station (LGS), Unit 1 and Unit 2 TS be issued by February 5, 1993, and be immediately effective in order to support the scheduled activities during the Unit 2 second refueling outage. This refueling outage is scheduled to begin on January 23, 1993.

Description of the Proposed Changes

The following is a description of the proposed changes, including identification of those proposed changes that have been revised to incorporate the pertinent STS SRs.

- 1) Change TS SR 4.1.5.a.3 from requiring that the SLC system heat tracing circuit be demonstrated operable, to requiring that the temperature of each SLC pump suction piping be greater than or equal to 70°F.
- 2) Revise the original proposed change to add the following to the footnote for TS SR 4.1.5.b.2; "within 24 hours after water or boron addition or solution temperature is restored."

- 3) Revise the original proposed change to TS SR 4.1.5.d.2 and associated footnote to require that all heat traced piping between the SLC system storage tank and SLC system pump suction piping is verified to be unblocked, and that this verification shall also be performed whenever SLC system pump suction piping temperature drops below 70°F, within 24 hours after solution temperature is restored.
- 4) Revise the original proposed change to TS SR 4.1.5.d.3 to require that only the "A" storage tank heater be demonstrated operable by deleting the requirement to demonstrate that the SLC system storage tank heaters are operable.

Discussion of Applicability of Original Information Supporting a Finding of No Significant Hazards Consideration to the Revised Proposed TS Changes

The information supporting a finding of No Significant Hazards Consideration provided in our April 3, 1992 Change Request was evaluated with respect to the revised TS changes proposed here. The basis of our original conclusion that the proposed changes do not involve a Significant Hazards Consideration reflected the recognition that the verification of SLC system operability should focus on maintaining or recovering the required temperature of the sodium pentaborate solution, and not on the means of achieving the solution temperature required to prevent precipitation. Since the revised proposed changes are consistent with this focus, our original conclusion that the proposed changes do not involve a Significant Hazards Consideration remains unchanged based on the information provided below.

- 1) The revised proposed TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The revised proposed SR to verify that the SLC system pump suction line is unblocked does not delineate a specific flow path. The current TS SR specified flow path from the SLC system storage tank to the test tank creates a large amount of liquid waste requiring special handling as a result of the post-test pipe flushing. An alternative testing method would be to pump solution from the storage tank to a test drain. This would reduce the amount of piping and equipment subjected to the flow of the sodium pentaborate solution and the subsequent required flushing. Accordingly, the result of performing the proposed SR would be equivalent to performing the current SR; affected heat traced piping would continue to be verified unblocked. The revised proposed SR deletes the prescribed method specified in the current and originally proposed TS, and thereby allows flexibility in the

methods employed to perform this SR verification. The revised proposed SR also includes a clarification of the period during which this SR is required to be performed if the piping temperature drops below the low temperature limit (i.e., 70°F).

The revised proposed SR changes include deletion of the required demonstration of SLC system storage tank heater operability. This proposed change is based upon the ultimate objective of determining SLC system operability as a function of the temperature of the sodium pentaborate solution in the storage tank, which the TS will continue to require to be checked daily, and not on the method of achieving this verification. Specifically, the storage tank heaters are the "A" heater, a 10KW cycling heater (i.e., controlling solution temperature between 75°F and 85°F), and the "B" heater, a 40KW manually operated heater used primarily during solution mixing activities. The storage tank is located within heated spaces of the Reactor Enclosure that are normally maintained at or above the "A" heater low temperature activation setpoint of 75°F. Furthermore, low storage tank solution temperature (i.e., 70°F) is alarmed in the Main Control Room.

In addition, the revised proposed SR includes clarification of the period within which the verification of solution concentration is required to be performed after water or boron is added to the storage tank, or if the solution temperature drops below 70°F. This clarification is based on the recognition of realistic time limits to perform actions to preclude precipitation of the sodium pentaborate.

Based on the above discussion, our previous conclusion that the proposed changes do not involve an increase in the probability or consequences of an accident previously evaluated remains unchanged.

- 2) The revised proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The revised proposed changes to the SLC system SRs do not add or delete any equipment, and do not involve any systems or equipment that would create an accident. Therefore, our previous conclusion that the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated remains unchanged.

- 3) The revised proposed TS changes do not involve a significant reduction in margin of safety.

The revised proposed changes to the SLC system SRs do not involve physical changes to the system, and continue to provide an

equivalent level of assurance that the SLC system will be capable of performing its safety function. Therefore, our previous conclusion that the proposed changes do not reduce the margin of safety remains unchanged.

Discussion of Applicability of Original Information Supporting an Environmental Assessment to the Revised Proposed TS Changes

Our conclusion that an environmental assessment is not required for the changes proposed in our original Change Request dated April 3, 1992, remains unchanged with respect to the revised changes proposed here. The revised proposed changes do not involve a Significant Hazards Consideration as discussed in the preceding section. The revised proposed changes still do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the revised proposed changes still do not involve an increase in the individual or cumulative occupational radiation exposure. Therefore, the revised proposed TS changes continue to conform to the criteria for "actions eligible for categorical exclusion" as specified in 10CFR51.22(c)(9).

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these revised proposed changes to the LGS Unit 1 and Unit 2 TS, and have concluded that they do not involve an unreviewed safety question, or a Significant Hazards Consideration, and will not endanger the health and safety of the public.