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January 21, 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  
Revised Schedule for Technical Specifications Change  
Requests Concerning the Standby Liquid Control System.

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 SRs in the draft improved Standard TS (STS) (i.e., NUREG-1433) for the appropriate SRs in our April 3, 1992 Change Request. 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,

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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.

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, by letter dated January 12, 1993, we submitted the requested substitution of the pertinent STS SLC system SRs to replace the changes proposed in our April 3, 1992 Change Request.

Our January 12, 1993 letter requested 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. Nevertheless, the ability to use either the STS SRs or the originally proposed changes to the TS SRs for establishing and maintaining the SLC system operability would have a substantial benefit with respect to the outage schedule. Specifically, removing the requirement for the "B" storage tank heater to be operable in order to maintain SLC system operability allows the electrical division associated with the "B" heater to be removed from service for maintenance without affecting the operability of the SLC system. In this way, other activities that require SLC system operability can be carried out concurrently (e.g., core alterations).

Subsequently, the NRC notified us by telephone on January 15, 1993, that the requested substitution could not be approved within the requested time period. Accordingly, we request that the changes proposed in our April 3, 1992 Change Request be processed as originally requested to support the schedule of the upcoming LGS Unit 2 refueling outage. We request that, if approved, the Amendments be issued by February 5, 1993, and be immediately effective. In addition, we request that the changes proposed in our January 12, 1993 Change Request also be processed and, if approved, be effective within 30 days of issuance of the Amendments.

Additionally, the NRC requested that we provide clarification of the term "verify" in TS SR 4.1.5.d.2 as proposed in our January 12, 1993 Change Request. The proposed TS SR requires that the SLC system be demonstrated operable at least once per 18 months during shutdown by "verifying all heat-traced piping between storage tank and pump suction is unblocked." The use of this terminology allows the flexibility in the method(s) used to "demonstrate" that the heat traced SLC system piping is unblocked without specifying a test flow path.

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

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