

Docket File



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

February 17, 1993

Docket Nos. 50-352  
and 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: SAFETY EVALUATION FOR PUMP AND VALVE INSERVICE TESTING PROGRAM (IST)  
RELIEF REQUEST, LIMERICK GENERATING STATION, UNITS 1 AND 2  
(TAC NOS. M83243, M83244, M83561, AND M83562)

By letters dated April 15, and May 1, 1992, you addressed the 15 anomalies identified in our letter dated March 5, 1991. Our March 5, 1991, transmittal contained a technical evaluation that addressed the licensee's first ten-year inservice testing program. Appendix A to that report identified the subject anomalies. Your first response addressed relief request 52-VRR-1, while the second submittal addressed the remaining anomalies. We have reviewed your submittals following the guidance of Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." Our safety evaluation report contains the evaluation of relief requests 52-VRR-1, GPRR-1, and GVRR-1.

Pursuant to 10 CFR 50.55a(f)(4), it is required that certain Class 1, 2, and 3 pumps and valves in water cooled nuclear facilities meet the inservice testing requirements stated in the ASME Boiler and Pressure Vessel Code, Section XI, specifically, Subsection IWP, "Inservice Testing of Pumps in Nuclear Plants," and Subsection IWV, "Inservice Testing of Valves in Nuclear Power Plants." However, the Commission can authorize alternatives pursuant to 10 CFR 50.55a(a)(3)(i) and (ii), and grant reliefs pursuant to (f)(6)(i), from ASME Code requirements upon making the necessary findings.

Table 1 provides our summary of the anomalies. It includes the description, and Philadelphia Electric Company's (PECo) actions, past and future. Item 2 in Table 1 addresses full-stroke exercising of the residual heat removal mini-flow check valves. PECO's proposed method of testing is not in compliance with the ASME Code requirements. PECO should submit a relief request for these valves within 90 days of the date of this letter.

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February 17, 1993

Further, in the Safety Evaluation (SE)/Technical Evaluation Report (TER) transmitted to you on March 5, 1991, Relief Request 43-VRR-1 was evaluated in Section 3.4.1.1 of the TER and granted by the staff as requested. However, the SE Table 1, page 3, incorrectly identified this relief request. The staff has noted the error and does consider Relief Request 43-VRR-1 granted.

Additional relief requests or changes to approved relief requests should be submitted for staff review and approval prior to implementation. However, new or revised relief requests meeting the positions of GL 89-04 should be submitted to the NRC staff, but can be implemented provided the guidance of GL 89-04, Section D, is followed. Also, IST Program changes that involve additions or deletions of components from the IST Program should be provided to the NRC.

The reliefs granted are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

The requests for relief comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations.

This letter closes TAC Nos. M83243, M83244, M83561, and M83562. If you have any questions, please call Frank Rinaldi at (301) 504-1444.

Sincerely,

/s/

Charles L. Miller, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
Safety Evaluation

cc w/enclosure:  
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Sincerely,

*Charles L. Miller*

Charles L. Miller, Director  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
Safety Evaluation

cc w/enclosure  
See next page

Mr. George J. Beck  
Philadelphia Electric Company

Limerick Generating Station,  
Units 1 & 2

cc:

J. W. Durham, Sr., Esquire  
Sr. V.P. & General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Mr. William P. Dornsife, Director  
Bureau of Radiation Protection  
PA Dept. of Environmental Resources  
P. O. Box 2063  
Harrisburg, Pennsylvania 17120

Mr. Rod Krich 52A-5  
Philadelphia Electric Company  
955 Chesterbrook Boulevard  
Wayne, Pennsylvania 19087-5691

Mr. James A. Muntz  
Superintendent-Technical  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. David R. Helwig, Vice President  
Limerick Generating Station  
Post Office Box A  
Sanatoga, Pennsylvania 19464

Mr. Gil J. Madsen  
Regulatory Engineer  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. John Doering  
Plant Manager  
Limerick Generating Station  
P.O. Box A  
Sanatoga, Pennsylvania 19464

Library  
US Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mr. George A. Hunger  
Project Manager  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Thomas Kenny  
Senior Resident Inspector  
US Nuclear Regulatory Commission  
P. O. Box 596  
Pottstown, Pennsylvania 19464

Mr. Larry Hopkins  
Superintendent-Operations  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Richard W. Dubiel  
Superintendent - Services  
Limerick Generating Station  
P.O. Box A  
Sanatoga, Pennsylvania 19464