

GL 94-03

**PECO NUCLEAR**

A Unit of PECO Energy

PECO Energy Company  
985 Chesterbrook Boulevard  
Wayne, PA 19087-5691

October 28, 1996

Docket No. 50-353  
License No. NPF-85U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555Subject: Limerick Generating Station, Unit 2  
Submittal of Inspection Plan in Response to  
Generic Letter 94-03, "Intergranular Stress Corrosion  
Cracking of Core Shrouds in Boiling Water Reactors"

Dear Sir:

On August 24, 1994, PECO Energy Company responded to Generic Letter (GL) 94-03, dated July 25, 1994, for Limerick Generating Station (LGS), Units 1 and 2, and Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. Reporting Requirement 2 of the GL requested that an inspection plan of the core shroud be submitted to the U. S. Nuclear Regulatory Commission (USNRC) no later than 3 months prior to performing the inspections except for those plants whose inspections would occur less than three months from the receipt of the GL. Our response for LGS, Unit 2, indicated that an augmented inspection program for the core shroud would be developed in consideration of recommendations by the Boiling Water Reactor Vessel and Internals Project (BWRVIP).

The BWRVIP recommendations are specified in the "BWR Core Shroud Inspection and Flaw Evaluation Guidelines," GENE-523-113-0894, Revision 1, dated March 1995. This document was submitted to the USNRC on April 25, 1995 by the BWRVIP. The LGS, Unit 2, core shroud is considered highly resistant to Intergranular Stress Corrosion Cracking (IGSCC) due primarily to plant water chemistry, material carbon content, fabrication history, neutron fluence and hot operating time.

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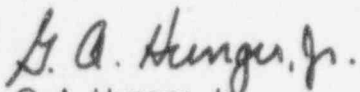
The LGS, Unit 2, core shroud has been identified by the BWRVIP document, Table 3-1, as an Inspection Category A plant based on: 1) the core shroud has been fabricated with low carbon content Type 304L stainless steel; 2) the core shroud has experienced less than eight (8) hot operating years, and; 3) the core shroud has consistently been exposed to water chemistry below BWR Water Chemistry Guideline Action Levels. An Inspection Category A plant is not expected to experience core shroud cracking in the near term and, as such, augmented examinations are not considered necessary at this time.

Commensurate with Inspection Category A, augmented examinations of the LGS, Unit 2, core shroud are not planned for the January 1997 Refueling Outage (2R04). This is based on the satisfactory completion of the LGS, Unit 2, ASME Code Section XI, in-vessel visual inspection (IVVI) conducted during 1995 (2R03) and the LGS, Unit 1, GL 94-03 augmented ultrasonic examinations of the core shroud conducted during 1996 (1R06).

Pursuant to the staff's conclusion in the Safety Evaluation Report for LGS, Unit 2, dated March 13, 1995, concerning this same subject, the augmented examination should be performed no later than the first refuel outage after LGS, Unit 2, surpasses eight (8) on-line years of operation in 1998. Accordingly, the GL 94-03 augmented examinations of the LGS, Unit 2, core shroud will be performed during the 1999 Refueling Outage (2R05).

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

Very truly yours,

  
G. A. Hunger, Jr.  
Director - Licensing

cc: H. J. Miller, Administrator, USNRC, Region I  
N. S. Perry, USNRC Senior Resident Inspector, LGS

COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

D. B. Fetters, being first duly sworn, deposes and says:

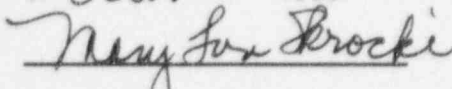
That he is Vice President of PECO Energy; the Applicant herein; that he has read the enclosed response to Generic Letter 94-03 dated July 25, 1994, for the Limerick Operating License NPF-85, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



Vice President

Subscribed and sworn to  
before me this 28<sup>th</sup> day

of October 1996.



Notary Public

Notarial Seal  
Mary Lou Strook, Notary Public  
Tredyffrin Twp., Chester County  
My Commission Expires May 17, 1998