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Feb. 11, 1986

Mr. Walter E. Butler, U.S Nuclear Reg. Commiss.  
BWR Project Directorate No. 4. Div. BWR Licensing  
Washington, D.C. 20555

Re: Phila Elec. Limerick  
Gen.Sta. Units 1 & 2.  
Docket No. 50-352,353

Dear Mr. Butler,

As intervenors in the Limerick licensing process under the name Robert L. Anthony/FOE we are referring to the notice in the Fed.Reg, 12/26/85, 52874-52876 signed by you and forwarded to us with a notice from NRC to E.G. BAUER, dated 1/27/86 .

DOCKETED  
86 FEB 27 P4:42  
1/30/86

Following the instructions in the F.R. notice we sent a letter to the Secretary, NRC, opposing the granting of the exemption requested by PECO and petitioning for a hearing and for leave to be admitted as intervenors to protect our safety and health. On 2/5/86 we followed this up with an amendment directed to the Secretary petitioning a second time to be admitted as intervenors and asking for a hearing. We trust these petitions will be granted.

In pursuing our petitions we are handicapped by what appears to us to be confusing and, we believe erroneous material in the 12/26/86 F.R. notice. We ask that you kindly supply clarification. Furthermore, we have been supplied with a copy of a letter, 1/29/86, from M. J. Cooney, PECO, to Robert Bernero, Dir. Div. BWR Licensing NRC. We are enclosing a copy of this letter which refers to a request for information (RAI) from R.E. Martin, NRC " in support of a December 18, 1985 Request for Amendment..". Are we to assume that this is the same letter of 12/18/85 referred to by you in your F.R. notice, p 52875 , from PECO ? We are also enclosing a copy of our letter of 1/30/86 to the Secretary and our amendment of 2/5/86. We seek clarification from you on the questions and comments set forth below.

1. Letter to R. Bernero, 1/29/86. Are the NPRDS valves reviewed in TABLE 1 similar to those which are the subject of the Amendment, F.R. 52874 ? F.R. states that the lines in question " are small (1 inch or less) " TABLE 1 specifies the sizes 1 " to 12 ". TABLE 2 "is a compilation of information regarding the valves for which temporary relief of the testing requirement is sought". This table specifies 37 valves ranging from three @ 1" to 12 @ 8", 8 @ 12", and one @ 15". Please explain the discrepancy in sizes between F.R. 52874 and these valves in the tables if this is the same 12/26/85 request for exemption from PECO.

2. If, as it appears to us, the amendment requested by PECO is the same one referred to in all the documents above, will it be necessary to publish a corrected notice in the Fed. Reg. and postpone action on the amendment ? We were informed on 2/5/86 by the Chief of Docketing that the Project Director will be the person to recommend to accept or deny the amendment request. If this is so, will Mr. R. Martin or any other NRC agent be prevented from acting on PECO's request ? Since Mr. Martin requested additional information and Mr. Cooney stated that a "multi-faceted program " had been undertaken but was incomplete as of 1/29/86, will NRC withhold action until the results of the "program" are in ?

3. Since the subject of the leak test exemption and extension of time limit is a deadline in the regulations which ends on 2/19/86, apparently, will you require PECO to comply with the regulations and the Technical Specifications and proceed to carry out the required surveillance tests by 2/19/86 ?

We repeat our petition to you and the Commission and all agencies of NRC to enforce the Tech. Spec. test requirements and require PECO to stop operating the unit 1 reactor as of 2/19/86 until the safe operation of the plant can be assessed from the results of the required valve tests.

We are serving copies of this letter by mail on the following: NRC: Commis., Sec., Gen. Counsel, R. Bernero, R.E. Martin, Docketing, Conner & Wetterhahn

Respectfully yours,  
*Robert L. Anthony*  
Box 186 Moylan, Pa. 19065

*Robert L. Anthony 2/12/86*

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PDR ADCK 05000352  
G PDR

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# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5020

January 29, 1986

Docket No. 50-352

M. J. COONEY  
MANAGER  
NUCLEAR PRODUCTION  
ELECTRIC PRODUCTION DEPARTMENT

Mr. Robert Bernero, Director  
Division of Boiling Water Reactor Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Bernero:

The following information is provided in response to a Request for Additional Information (RAI) from Mr. R. E. Martin, Limerick Project Manager, of your staff, in support of a December 18, 1985 Request for Amendment to the Limerick Operating License and Temporary Exemption to the requirements of Appendix J to 10 CFR 50.

This request was directed towards supplying information relative to industry experience with valves similar to those which were the subject of the Amendment Request. In order to support this RAI, a multi-faceted program has been undertaken which includes the following: 1) Review of Nuclear Plant Reliability Data systems; 2) Contact with other utilities identified as having similar valves; 3) Contact with valve manufacturers of the specific valves; and 4) Review of general experience with testing of similar valves at Peach Bottom Atomic Power Station (PBAPS).

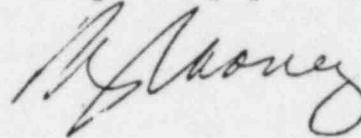
Table 1 (attached) addresses item 1 above. Items 2 and 3 remain under investigation. In response to item 4, general experience with similar valves at PBAPS indicates that valve leakage appears to be related to type of service and time in service. Valves which are used in non-modulating applications, such as those which are the subject of this amendment request, tend not to have problems meeting leakage criteria.

Table 2 (attached) is a compilation of information regarding the valves for which temporary relief of the testing requirement is sought.

The information gathered thus far has revealed nothing which would alter or affect the conclusions contained within our application.

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

Very truly yours,



Attachments

cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC  
E. M. Kelly, Senior Resident Site Inspector  
See Attached Service List

Table 1 - Explanation

Results of review of industry experience conducted through Nuclear Plant Reliability Data System

Columns 1, 2, 3, 4

Manufacturer, Model Number, Size and Type of valves which are the subject of the amendment request.

Column 5 - Similar Number Identified

Number of valves identified upon interrogation of NPRD data base. Search was based upon manufacturer, type and size range (e.g. Velan, gate, 2"-6"). Computer generated listing was manually sorted to identify similar model numbers. If no similar model numbers were identified, the number reported represents the numbers of all valves of same manufacturer, type and specific size.

Column 6

NPRD failure reports were obtained for all valves identified and reported in Column 5. These reports were reviewed and those failures which were relevant to leakage rates and isolation function are tabulated. It is notable that the reported failures concern valves which have been in service for significant periods and were reported to NPRD as "wear-out".

Column 7

Identifies those totals which are reported for all valves of same size when similar model numbers could not be identified.

TABLE 1

NPRDS REVIEW  
OF  
SIMILAR VALVES

MANUFACTURER	MODEL	SIZE	TYPE	SIMILAR NUMBER IDENTIFIED	MEANINGFUL FAILURES REPORTED	COMMENTS
Velan	B12-00054B-02WN B10-00054B-02WN	3"	Gate	30	0	
Crane	Cat. #47XUF	8"	Gate	198	0	
Rockwell	1-3624F316LMT 1 1/2-3624F316LMMT	1" 1 1/2"	Globe Globe	492	28	
Atwood & Morrill	13673-02-03-05-06 13673-01-04	12"	CK	0(61*)	6*	*All Models.
Anchor/Darling	SJO-2171-52	8"	Gate	0(337*)	4*	*All Models.
	SJO-2159-15 SJO-2159-16 SJO-5348-06	6"	Globe	0(46*)	1*	*All Models.
	SJO-5348-07	12"	Gate	0(226*)	1*	*All Models.
Borg Warner	Part No. 77940	1"	CK	0(21*)	0	
Circle Seal	NV02-14	1"	CK	0(14*)	2*	*All Models.

TABLE 2

Penetration Number and Description	Valve Numbers (Size - Inches)	Test Medium	Frequency of Valve Operation	Previous Test Results	Process Fluid	Manufacturer	Valve Type	Model Number
X-3D Instrument Gas Supply	HV-59-151B (1) 59-1112 (1)	Air	N.O. Stroked Quart Check Stroked Refuel	7.54 SCCM 1.45 SCCM	PCIG or Instrument Air	Rockwell Circle Seal	Globe Check	1-3624 F316LMT NV02-14
X-13A 'A' RHR Shutdown Cooling Return	HV-51-1F050A (12) HV-51-151A (1.5)	Air/ Water	Check Stroked Refuel N.C. Not Stroked	0.1 GPM* 0.1 GPM*	Reactor Demineralized Water	Atwood & Morrill  Rockwell	Check  Globe	13673-01-04  1 1/2-3624F316 LMTT
X-13B 'B' RHR Shutdown Cooling Return	HV-51-1F050B (12) HV-51-151B (15)	Air/ Water	Check Stroked Refuel N.C. Not Stroked	0.0 GPM* 0.0 GPM*	Reactor Demineralized Water	Atwood & Morrill Rockwell	Check Globe	13673-01-04 1 1/2-3624F316 LMTT
X-14 Reactor Water Cleanup Supply	HV-44-1F001 (6) HV-44-1F004 (6)	Air	N.O. Stroked Quart N.O. Stroked Quart	24.0 SCCM 485.75 SCCM	Reactor Demineralized Water	Anchor/Darling Anchor/Darling	Globe Globe	SJO-2159-15 SJO-2159-16
X-23 Reactor Enclosure Cooling Supply	HV-13-106 (4) HV-13-108 (3) HV-13-109 (3)	Air	N.O. Stroked Refuel N.O. Stroked Refuel N.C. Not Stroked	121.8 SCCM 23.25 SCCM* 23.25 SCCM*	React. Encl. Cooling Water Demin. Water	 Velan Velan Velan	Gate Gate Gate	B12-00054B-02WN B10-00054B-02WN B10-00054B-02WN
X-24 Reactor Enclosure Cooling Return	HV-13-107 (4) HV-13-110 (3) HV-13-111 (3)	Air	N.O. Stroked Refuel N.C. Not Stroked N.O. Stroked Refuel	5.2 SCCM 3.6 SCCM* 3.6 SCCM*	React. Encl. Cooling Water Demin. Water	 Velan Velan Velan	Gate Gate Gate	B12-00054B-02WN B10-00054B-02WN B10-00054B-02WN
X-45A 'A' RHR LPCI	HV-51-1F041A (12) HV-51-1F017A (12) HV-51-142A (1.5)	Air/ Water	Check Stroked Refuel N.C. Stroked Refuel N.C. Not Stroked	0.0198 GPM* 84.75 SCCM 0.0198 GPM*	Suppression Pool Water	Atwood & Morrill Anchor/Darling Rockwell	Check Gate Globe	13673-02-03-05-06 SJO-5348-07 1-3624F316LMTT
X-45C 'C' RHR LPCI	HV-51-1F041C (12) HV-51-1F017C (12) HV-51-142C (1.5)	Air/ Water	Check Stroked Refuel N.C. Stroked Refuel N.C. Not Stroked	0.002 GPM * 148. SCCM 0.002 GPM *	Suppression Pool Water	Atwood & Morrill Anchor/Darling Rockwell	Check Gate Globe	13673-02-03-05-06 SJO-5348-07 1-3624F316LMTT
X-45D 'D' RHR LPCI	HV-51-1F041D (12) HV-51-1F017D (12) HV-51-142D (1.5)	Air/ Water	Check Stroked Refuel N.C. Stroked Refuel N.C. Not Stroked	0.0828 GPM* 976.8 SCCM 0.0828 GPM*	Suppression Pool Water	Atwood & Morrill Anchor/Darling Rockwell	Check Gate Globe	13673-02-03-05-06 SJO-5348-07 1-3624F316LMTT
X-53 Drywell Chilled Water Supply	HV-87-120A (8) HV-87-125A (8) HV-87-128 (8)	Air	N.O. Stroked Quart N.C. Stroked Quart N.O. Stroked Quart	170.5 SCCM* 170.5 SCCM* 32.25 SCCM	Demineralized Water	Crane Crane Anchor/Darling	Gate Gate Gate	Cat. No. 47XUF Cat. No. 47XUF SJO-2171-52



