PECO NUCLEAR
A Unit of PECO Energy

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

May 2 , 1997

Docket Nos. 50-277
50-278
50-352
50-353

License Nos. DPR-44
DPR-56
NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Review of Updated Final Safety Analysis Reports (UFSARs)

Reference: Letter, D. B. Fetters (PECO Energy) to USNRC dated February 4, 1997 "Request For Information Pursuant to 10 CFR50.54(f) Regarding Adequacy and Availability of Design Bases Information"

Gentlemen:

The reference letter provided PECO Energy's response to NRC's request for information involving adequacy and availability of Design Bases information. In Attachment 3 of the February 4, 1997 letter PECO Energy made the following commitment:

"PECO Nuclear is committed to complete the verification of the UFSAR and is evaluating the scope and schedule of the UFSAR verification project. PECO Nuclear will provide additional information on the scope and schedule of the completion of the UFSAR verification project within 90 days of the date of this letter." 030039

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The purpose of this letter is to respond to the aforementioned commitment.

PECO Energy intends to complete the voluntary verification of the Peach Bottom and Limerick UFSARs in a phased approach. In May 1996 PECO Energy completed a knowledge-based review of 100% of the Peach Bottom UFSAR. During June-September 1996 PECO Energy performed a more detailed review of selected sections of the Peach Bottom and Limerick UFSARs. Section selection for this phase was based on Probabilistic Safety Assessment (PSA) significance and engineering judgment. By October 18, 1998 PECO Energy will perform an additional detailed review of Peach Bottom and Limerick UFSAR sections identified as high priority. This review will be similar to the methodology that was used to evaluate portions of the Peach Bottom and Limerick UFSARs in 1996, as described in the reference letter, and will incorporate lessons learned from the 1996 reviews. Listings of the Peach Bottom and Limerick UFSAR high priority sections are attached.

Additionally, a knowledge-based review will be completed for all sections of the Limerick UFSAR that were not reviewed as part of the 1996 verification project. This review will be performed by individuals knowledgeable in the sections that they have been assigned to review and is intended to be less rigorous than the reviews that are scheduled to be performed for the high priority sections. The knowledge-based review that was completed for 100% of the Peach Bottom UFSAR was found to be beneficial in identifying UFSAR discrepancies.

The knowledge-based reviews and the more detailed reviews of the high priority sections comprise the Licensee Initiative as described in the NRC's "Policy and Procedure for Enforcement Actions; Departures from FSAR" Section 4-Old Design Issues, published in the Federal Register on October 18, 1996. In accordance with the timeliness condition specified in the Federal Register Notice, the PECO Energy Initiative will be completed by October 18, 1998 in order to maximize the potential for obtaining enforcement discretion involving UFSAR discrepancies, should such discretion be needed.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.
Director - Licensing

Attachment
cc: H. J. Miller, Administrator, Region I (w/attachment)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/attachment)
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS (w/attachment)
R. R. Janati, PA Bureau of Radiation Protection (w/attachment)

ATTACHMENT

Peach Bottom Atomic Power Station - Units 2 and 3

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Limerick Generating Station - Units 1 and 2

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"List of Peach Bottom and Limerick UFSAR Sections Identified as High Priority"

(2 Pages)

PBAPS UFSAR HIGH PRIORITY SECTIONS

UFSAR SECTION	SUBSECTION	DESCRIPTION
4		REACTOR COOLANT SYSTEM
	4.4	Nuclear System Pressure Relief
	4.10	Leak Detection and Leakage Rate Limits
5		CONTAINMENT
	5.2	Primary Containment
	5.3	Secondary Containment
6		CORE STANDBY COOLING SYSTEMS
	6.2	Safety Design Basis
	6.3	Summary Description
	6.4	CSCS Descriptions (ADS only)
	6.5	Safety Evaluation (ADS only)
	6.6	Inspection and Testing
7		CONTROL AND INSTRUMENTATION
	7.4	Core Standby Cooling Systems (ADS only)
	7.7	Reactor Manual Control System
	7.12	Process Radiation Monitoring
	7.17	Nuclear System Stability Analysis
	7.18	Separate Shutdown Control Panels
	7.20	Accident Monitoring
8		ELECTRICAL POWER SYSTEMS
	8.6	120VAC Power System
	8.8	24VDC Power Supply and Distribution
10		AUXILIARY SYSTEMS
	10.4	Tools and Servicing Equipment
	10.12	Fire Protection Program
	10.24	Emergency Heat Sink
12	ALL	STRUCTURES AND SHIELDING
App A	ALL	PRESSURE INTEGRITY OF PIPING AND EQUIP. PRESSURE PARTS
App C	ALL	STRUCTURAL DESIGN CRITERIA
App E	ALL	STATION ATMOSPHERIC RELEASE LIMIT CALCULATIONS
App F	ALL	INTERACTION OF UNITS 2 AND 3
App H	ALL	CONFORMANCE TO AEC (NRC) CRITERIA
App J	ALL	IDENTIFICATION-RESOLUTION OF AEC-ACRS AND STAFF CONCERNS
App M	ALL	CONTAINMENT REPORT

LGS UFSAR HIGH PRIORITY SECTIONS

UFSAR SECTION	SUBSECTION	DESCRIPTION
1		INTRODUCTION AND GENERAL DESCRIPTION OF PLANT
	1.13	TMI-2 Related Requirements for New Operating Licenses
3		DESIGN OF STRUCTURES, COMPONENTS, EQUIPMENT, AND SYSTEMS
	3.2	Classification of Structures, Components, and Systems
	3.6	Protection Against Dynamic Effects Associated with the Postulated Rupture of Piping
	3.8	Design of Category I Structures
	3.9	Mechanical Systems and Components
	3.10	Qualification of Seismic Category I Instrumentation and Electrical Equipment
	3.11	Environmental Design of Mechanical and Electrical Equipment
	3A	Design Assessment Report (Nonproprietary)
	3B	Design Assessment Report (Proprietary)
4		REACTOR
	4.2	Fuel System Design
	4.3	Nuclear Design
	4.4	Thermal and Hydraulic Design
	4.6	Function Design of Reactivity Control Systems
6		ENGINEERED SAFETY FEATURES
	6.0	Introduction
	6.1	Engineered Safety Feature Materials
	6.3	Emergency Core Cooling Systems
	6.4	Habitability Systems
	6.6	Preservice/Inservice Inspection of Class 2 and 3 Components
7		INSTRUMENTATION AND CONTROLS
	7.2	Reactor Trip System (RPS)
	7.3	Engineered Safety Feature Systems
	7.4	Systems Required for Safe Shutdown
	7.5	Information Systems Important to Safety
	7.6	All Other Instrumentation System Required for Safety
8		ELECTRIC POWER
	8.1	Introduction
	8.2	Offsite Power System
	8.3	Onsite Power Systems
9		AUXILIARY SYSTEMS
	9.3	Process Auxiliaries
	9.4	Heating, Ventilation, Air Conditioning, and Cooling Systems
	9.5	Other Auxiliaries Systems
	9A	Fire Protection Evaluation Report
15	ALL	ACCIDENT ANALYSES