

January 30, 1986

'86 FEB 12 P12:00

Dear Sir,

We are responding to a copy of a document dated 1/27/86 to Mr. E.G. Bauer, Phila. Elec. Co., from NRC which is a form relating to Limerick Generating Station, Unit 1, identified as "Monthly Notice; Applications and Amendments to Operating Licenses Involving no Significant Hazards considerations, dated Dec. 26 & 30, 1986 and Jan. 9, 1986". With this document we received copies of the Federal Register which inform that the NRC is considering issuance of an amendment to Op.Lic # NPP-39 to PECO for the operation of Limerick Gen.Sta. No 1. This would allow PECO an extension of time for testing certain instrument lines to a maximum of 96 days beyond the time required in the Tech.Specs.

As an intervenor in the Limerick licensing proceedings under the name R.L. Anthony/FOE we register our opposition to the granting of this extension of time and we request a hearing, and petition for leave to intervene. In accordance with the instructions on p.52875 F.R. we notified Western Union this morning, Datagram # 3737 to NRC, to this effect. We call your attention to the fact that we could not have responded any earlier since the NRC notice, 1/27/86, reached us only on 1/29/86.

We are convinced that any extension of time for the tests required to determine the ability of the instrumentation lines to function properly would pose risks to our health and safety since these lines are essential to operator information and functioning in every aspect of the plant's operation and are a key link in the control of the nuclear process and absolutely essential to the safe shutdown of the plant in the event of any accident at the plant which could result in the release of radioactive poisons to the environment, thereby threatening us and the public.

It is especially important for these lines to be checked for any faults or weaknesses which could cause them to mal-function in case of any accidental force which might be applied to them from the rupture or whipping of adjacent pipes. This kind of eventuality was reported in a study by Torrey Pines Technology for PECO, entitled "Independent Design Review of Limerick Generating Station, Unit no.1, Core Spray System." We are enclosing a copy of page 12 from Vol.1 of this study, Executive Summary, Nov. 1984, which gives conclusions on small pipes.

The findings in this study are particularly significant in relation to instrumentation lines and possible jet impingement loads. Paragraph two on page 12 points out "unconservative extrapolations of test data" and calls attention to the need for sophisticated analyses and possible impingement barriers. We have no information as to whether such barriers have ever been placed. This would be one of the avenues of our questioning in a hearing. We would also follow up the warnings in paragraph three, "multiple errors and inconsistencies" and "the impact of the errors" which "could not be assessed within the TPT (Torrey Pines) review scope". We have no information on "analyses" or "design modifications" which are listed as possible corrective actions.

We suggest to the Commission that ^{it} is essential for the safe operation of the instrumentation lines to conduct the tests on the schedule set up in the Tech. Specs. The safe operation of the plant and the protection of the health and safety of the public depend on this. Any action by NRC without a hearing would be prejudicial. Enc'd p.12 Torrey Pines Design Review, Nov. 1984

cc: NRC Exec. Legal Dir., Conner and Wetterhahn
Others on Serv. List.

Sincerely yours,

Robert L. Anthony

High and Moderate Energy Line Break Analysis, Feature 10

One Observation and three Findings resulted from the review of this feature. The Observation notes that an HVAC duct which was subject to jet impingement from a Core Spray line break was not identified in the analyses for the consequences of that break. Subsequent investigation revealed redundant cold air sources so that there would be adequate cooling.

One of the Findings pointed out the use of unconservative extrapolations of test data to evaluate the adequacy of instrumentation line subject to jet impingement loads. Review of subsequent conventional computer analysis by BPC for the instrument line impinged by a jet from a broken Core Spray pipe showed the adequacy of that instrument line. However, there were other instrument lines which were considered adequate based on the same unconservative extrapolation of the test data. The PECO CAP states that analyses will be made for all such instrument lines, and that if conventional computer analysis does not show the adequacy of the instrument lines, more sophisticated analyses or tests would be performed. Only as a last resort would jet impingement barriers be utilized. The CAP adequately addresses the concerns raised by the Finding.

The remaining two Findings addressed multiple errors and inconsistencies in the analyses which were performed to show that the plant could be safely shut down following postulated breaks in the Core Spray piping. An accurate assessment of the impact of these errors would have required significant review of plant systems and equipment which were not within the CSS. This would have gone far beyond the intended scope of the TPT review. Thus the impact of the errors could not be assessed within the TPT review scope. The multiplicity of the errors also suggested that other errors could exist which were not investigated. The PECO CAP for these two Findings identifies that all plant safety analyses associated with jet impingement will be reviewed to assure that a logical prescribed methodology is followed and that all errors and inconsistencies found are corrected. The prescribed methodology includes provision for more sophisticated analyses, or, as a last resort, design modifications. The CAP adequately addresses the concerns raised by the Findings.

KEY: HVAC = HEATING, VENTILATION AND COOLING
BPC = BECHTEL POWER CORP.
CAP = CORRECTIVE ACTION PLAN (UNDERLINING ADDED)
CSS = CORE SPRAY SYSTEM
TPT = TORREY PINES TECHNOLOGY