

Butler

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-5001

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

February 25, 1986

Docket No. 50-352

License No. NPF-39

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 from Mr. R. E. Martin of your staff for additional information on Philadelphia Electric's request for a temporary one-time exemption to the schedular requirements of Appendix J to 10 CFR Part 50 for Limerick Generating Station Unit No. 1 dated December 18, 1985. Specifically, the Licensee was requested to address the special circumstances which it believes are present, which justify the granting of the requested relief.

Licensee believes that special circumstances are present in the request under consideration in that: 1) Application of the schedular requirements of Appendix J to Part 50 in the particular circumstance is not necessary to achieve the underlying purpose of Appendix J; and 2) The exemption would provide only temporary relief from Appendix J and the Licensee has made good faith efforts to comply with the regulations.

Application of the regulation in the particular circumstance is not necessary to achieve the underlying purpose of the rule.

Licensee's December 18 submittal includes information which demonstrates that the underlying purpose of the regulation is met. The fundamental purpose of Appendix J to 10 CFR 50 is

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to provide assurance, on a schedule approximately consistent with the refueling cycle, that leakage from primary containment is within certain limits. In addition, the testing delineated by the Appendix provides assurance that the valves in question are maintained and repaired during their service life in addition to being relatively leak tight. The valves for which relief is sought represent only approximately 10% of the containment isolation valves. Initial experience with these valves has been good. The initial testing on these valves was favorable with the total leakage being a small percentage of the total containment leakage and an insignificant fraction of the total allowable leakage. Due to the fact that these valves are in the initial cycle, characteristics of normal startup testing schedules (and including unforeseen licensing delays which were beyond the control of Licensee) are such that the valves have seen limited operations and exposure to the type of operating environment that was anticipated when the testing interval was established. Industry experience with these types of valves is not indicative of high maintenance or leakage characteristics. In light of the fact that the extension which is sought is only twelve weeks, and considering the foregoing information, it can be concluded that the purpose of the regulations is met.
(50.12(a)(2)(ii))

The exemption would provide only temporary relief from the applicable regulation and the licensee has made a good faith effort to comply with the regulations.

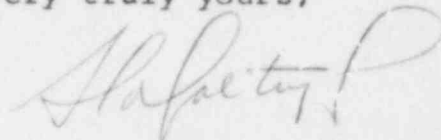
The request is for a one-time temporary exemption extending the Type C testing interval specified in 10 CFR 50, Appendix J, Section III.D.3, for only 27 of the containment isolation valves by a factor of approximately 12%. The twenty-seven valves in question cannot be tested at power for the reasons stated in the December 18 submittal. Of approximately 245 containment isolation valves, all but the subject 27 valves and ten others (which are not subject to Appendix J) have been successfully tested in accordance with the Technical Specifications and Appendix J. The extended time associated with obtaining the full power license was beyond licensee's control and is a major factor in the need for schedule relief. All low power (less than 5% thermal power) testing was completed prior to April, 1985. The full power license was delayed until August, 1985. During this period, the unit was maintained in a 48-hour standby condition to demonstrate its availability for operation; therefore, testing of these valves was not possible. During the same time period surveillance testing was completed on approximately 50

containment isolation valves to assure compliance with the then existing February 1986 outage schedule. After receipt of the full power license, the outage schedule was re-evaluated resulting in the establishment of late May for the outage. Upon recognition of the current scheduler constraint, efforts were promptly undertaken to assure that all valves which did not require a plant shutdown to test were tested (approximately 18) within their specified intervals. The foregoing information demonstrates that the criteria of 50.12(a)(2)(v) have been met, the exemption is temporary, and the Licensee has made good faith efforts to comply with the regulations.

Licensee has concluded that the information presented herein, together with the information in the December 18, 1985 application, satisfy applicable criteria so as to permit an expeditious granting of the sought after amendment to the Limerick Operating License and exemption to the requirements to Appendix J of Part 50.

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

Very truly yours,



cc: E. M. Kelly, Senior Resident Site Inspector
See Attached Service List

cc: Troy B. Conner, Jr., Esq.
Ann P. Hodgdon, Esq.
Mr. Frank R. Romano
Mr. Robert L. Anthony
Ms. Phyllis Zitzer
Charles W. Elliott, Esq.
Barry M. Hartman, Esq.
Mr. Thomas Gerusky
Director, Penna. Emergency Management Agency
Angus Love, Esq.
David Wersan, Esq.
Robert J. Sugarman, Esq.
Kathryn S. Lewis, Esq.
Spence W. Perry, Esq.
Jay M. Gutierrez, Esq.
Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
Docket & Service Section (3 Copies)
E. M. Kelly
Timothy R. S. Campbell

February 4, 1986