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September 12, 1988

Docket No.: 50-352

50-353

Mr. Edward C. Wenzinger, Chief Projects Branch No. 2 Division of Reactor Projects USNRC Region I ATTN: Document Control Desk Mail Station P1-137 Washington, DC 20555

Subject:

I.E. Bulletin 85-03 "Motor-Operated Valve Common Mode Failures During Plant Transients Due to Improper Switch Settings" Limerick Generating Station Units 1 & 2

References:

- S. J. Kowalski (PECo) letter to E. C. Wenzinger (NRC), dated May 27, 1988
 - (2) E. C. Wenzinger (NRC) letter to J. S. Kemper (PECo), dated March 29, 1988
 - (3) J. S. Kemper (PECo) letter to W. T. Russell (NRC), dated November 17, 1987
 - (4) I.E. Bulletin 85-03 Supplement 1, dated April 27, 1988

(5) I.E. Bulletin 85-03, dated November 15, 1985

Dear Mr. Wenzinger:

The purpose of this letter is three fold. First, it serves to advise you that the previous information submitted by References (1) and (3) is directly applicable to Limerick Unit 2. Second, it provides an update of the design basis differential pressure information to address I.E. Bulletin 85-03, Supplement 1. Last, it provides an estimated schedule for the completion of the currently defined I.E. Bulletin 85-03 field activities at Limerick Unit 2. With this letter, PECo considers I.E. Bulletin 85-03 closed at Limerick Unit 2.

Limerick Unit 1 Submittal Applicability

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Reference (1) provided the Limerick Unit 1 response to the NRC Request for Additional information (RAI) made by Reference (2). Reference (3) provided the final Limerick Unit 1 report required by I.E. Bulletin action item (f). With the exception of the Limerick Unit 1 test results found in Reference (3), the information contained in these submittais is directly applicable to Limerick Unit 2 and should be considered as part of our Limerick Unit 2 I.E. Bulletin 85-03 response.

I.E. Bulletin 85-03 Supplement 1 Update

Subsequent to the Issuance of BWROG Report NEDC 31322 Supp. 1 (June 20, 1988) which considers valves previously excluded by the BWROG, PECo reviewed the new recommended differential pressures (D-P) against those originally reported. This review revealed that in all cases, the newly calculated maximum differential pressures were less than those reported in Reference (3) as forming the bases for the minimum required torque switch settings. (Reference (3) indicated that the higher of the maximum calculated D-P or purchase spec. D-P would apply.) On the four MOVs listed below, the calculated maximum differential pressures did increase but the resulting values were still less than those originally specified:

MOV	BWROG Valve #	Max D-P (Ref. 3)	Max D-P (BWROG)	Purchase Spec.
HV-55-F004	HPCI-3	23	50	125
HV-55-F007	HPCI-8	1171	1357	1625
HV-49-F010	RCIC-3	22	50	125
HV-49-F012	RCIC-8	1171	1175	1500

These changes did not result in any MOV switch setting adjustments at either of the Limerick units.

Completion of Limerick Unit 2 I.E. Bulletin 85-03 Activities

The Limerick program to establish, test and maintain motor-operator switch settings is identical between Units 1 and 2. PECo has confirmed the adequacy of this program by representative differential pressure testing at Limerick Unit 1 (see Reference (3)). The only remaining Unit 2 activity is the baseline MOVATS testing which is near completion. With all program elements in place, PECo considers the I.E. Bulletin 85-03 and Supplement 1 requirements completed at Limerick Unit 2.

If you have any questions or require any additional information regarding our I.E. bulletin 85-03 program, please do not hesitate to contact us.

Sincerety,

TSN/pd08038806

Copy to: Addressee R. J. Clark, USNRC Project Manager LGS Resident Site Inspectors, Units 1 and 2 NRC Division of Operational Events Assessment NRC, Document Control Desk Washington, DC 20555