

original spray pond requirements described in FSAR, Section 9.2.6 and approved by the NRC for two unit operation in SER Section 9.2.5 and Supplements 3 and 4.

Licensee requests that the proposed changes become effective upon the issuance of an operating license for Limerick Unit 2.

System Discussion:

The ultimate heat sink (UHS), a spray pond, serves the safety-related functions of providing cooling water, and acting as a heat sink for the Emergency Service Water (ESW) system and the Residual Heat Removal Service Water (RHRSW) system during accident conditions. The UHS is designed to provide sufficient cooling water to the ESW and RHRSW systems, permitting simultaneous safe shutdown and cooldown of both units, and maintaining them in a safe shutdown condition. Further system description, design and operation information can be found in LGS FSAR Section 9.2.6.

Description of Changes:

Licensee proposes a change in Technical Specification 3.7.1.3.a spray pond level requirements from 250'0" to 250'10" above mean sea level. The LGS FSAR Section 9.2.6 specifies that the spray pond level required for two unit operation is a volume of 28.92×10^6 gallons or 250'10". The volume associated with the current level of 250'0" provides design cooling requirements for only a single unit and was put in place originally to avoid operating restrictions associated with maintaining a water volume for two unit operation while only a single unit was licensed. The purpose of the proposed change is to

revise the Technical Specifications to reflect the spray pond level requirement which was previously approved for two unit operation.

Safety Discussion:

A spray pond level of 250'10" reflects the minimum two unit volume requirement of 26.92×10^6 gallons. The analysis supporting 250'10" is presented in FSAR Section 9.2.6 and demonstrates the ability of the spray pond to provide a 30 day cooling supply below the maximum pond temperature limit without make-up or blowdown, considering the design basis heat input and meteorological conditions. The NRC approval of the spray pond is set forth in SER Section 9.2.5 (NUREG 0991) and Supplements 3 and 4. For one unit operation, the Technical Specification limit was set to a value lower than what is required for two unit operation to avoid the unnecessary operating restrictions which may result from having to maintain an excess spray pond volume.

The increase in pond level to meet the proposed Technical Specification will not affect the design flood calculation. The original spray pond maximum water elevation calculations were done modeling the spray pond full to its spillway elevation (251' 0") then adding a probable maximum precipitation event, causing water to spill from the emergency spillway.

No Significant Hazards Consideration:

- (1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Raising the minimum level to 250'10" is within the bounding conditions for the accident/design analysis referred to in FSAR section 9.2.6 and

accepted by the NRC in Section 9.2.5 of the Safety Evaluation Report (SER) and Supplements 3 and 4 for Limerick Generating Station. The requirement to provide a 30 day cooling supply for two unit operation while complying with all the requirements of the Standard Review Plan (as discussed in SER Section 9.2.5 and Supplements 3 and 4) is provided by raising the minimum level to 250'10". The cooling supply is designed to accommodate:

- i) single unit LOCA and safe shutdown of the other unit,
- ii) safe shutdown of both units.

The design basis accident analyses described in FSAR Chapter 15 are unaffected, therefore there is no significant increase in the probability or consequences of an accident previously evaluated.

- (2) The proposed change does not change or create the possibility of a new or different kind of accident previously evaluated.

As discussed in criterion one, the requested change provides spray pond level requirements within the scope of the accepted FSAR analysis. Therefore, the proposed change does not create the possibility of a new or different kind of accident previously evaluated.

- (3) The proposed change does not involve a significant reduction in a margin of safety.

The proposed change raises the minimum spray pond level to provide a margin of safety consistent with that previously approved for two-unit operation in section 9.2.5 of the LGS SER and Supplements 3 and 4 and is detailed in FSAR section 9.2.6. A spray pond level of 250'10" will

provide a 30 day cooling supply for two unit operation while complying with the design requirements of the Standard Review Plan (as discussed in SER 9.2.5 and Supplements thereto). The current Specification provides the cooling supply for a single unit only. Design requirements are identical for the current Specification and the proposed Specification so that there is no reduction in a margin of safety.

Environmental Considerations:

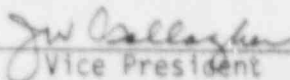
Licensee has determined that the amendment requested in this Application involves no increase in the amounts and no change in the types of any effluents that may be released offsite and has also determined that there is no increase in the individual or cumulative occupational radiation exposure. Therefore, there is no environmental consideration involved with this Application and consequently an environmental report is not submitted.

Conclusion

Licensee has reviewed the proposed change to the Technical Specifications and has concluded it does not involve significant hazards considerations, an unreviewed safety question or an environmental consideration and will not endanger the health and safety of the public.

Respectfully submitted,

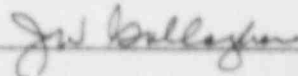
PHILADELPHIA ELECTRIC COMPANY


Vice President

COMMONWEALTH OF PENNSYLVANIA :
 : SS.
COUNTY OF PHILADELPHIA :

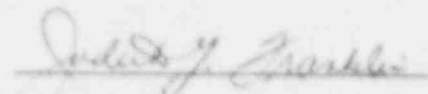
J. W. Gallagher, being first duly sworn, deposes and says:

That he is the President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



Vice President

Subscribed and sworn to
before me this 7th day
of Sept, 1988.



Notary Public

JUDITH Y. FRANKLIN
Notary Public, Phila., Phila. Co.
My Commission Expires July 28, 1991