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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

March 4, 1986

Docket No. 50-352

Mr. W. R. Butler, Chief
License Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Report of Change Being Made to the
Limerick Generating Station, Unit 1
Initial Test Program

Dear Mr. Butler:

Condition No. 2.c(6) to the Limerick Generating Station License NPF-39 requires that changes made to the initial testing program described in the Final Safety Analysis Report be reported in accordance with the provisions of 10 CFR 50.59(b) within one month of such change.

The following Startup Test Program area has been changed:

- o Test STP-25.3, MSIV Full Closure Testing, has been changed to test plant response during the closure of MSIV's at 90 to 100% power in lieu of the original testing requirements of 95 to 100% power.

On December 18, 1985 during a planned unit shutdown, a test window became available for conducting STP-25.3. However, the unit was at 91.7% power, rather than above 95% power as stipulated. Analysis of the data taken during the transient indicates that testing at 91.7% is well within acceptable bounds of the predicted results because:

- o Performance of the plant and all protection systems is essentially the same at 100% power as that observed at 91.7% power.

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- o The full power turbine trip (STP-27) which was more conservative and caused a more rapid shutoff of the main steam than the MSIV closure event was successfully performed during Test Condition 6, and resulted in a system response similar yet more conservative than test STP-25.3.
- o Level 1 and Level 2 acceptance criteria for the MSIV (100% power) closure test were successfully demonstrated by the 91.7% power event.
- o Operation of the MSIVs has been acceptably demonstrated previously during STP-25.1 and STP-25.2, MSIV functional testing.

Performance of an additional MSIV closure test at 95-100% power would provide only minimal additional information, since all of the objectives of test STP-25.3 were achieved successfully during the closure event conducted at 91.7% power.

This change does not involve an unreviewed safety question because it does not affect the evaluated design and does not affect any technical specification nor change any plant safety-related systems or equipment.

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

Very truly yours,



cc: Dr. Thomas E. Murley, Administrator, Region I, USNRC
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See Attached Service List

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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