



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENTS NOS. 131 AND 92 TO FACILITY OPERATING

LICENSES NOS. NPF-39 AND NPF-85

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated February 25, 1997, as supplemented September 8 and November 18, 1997 and January 8 and July 2, 1998, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Facility Operating Licenses (FOLs), Technical Specifications (TSs) and Environmental Protection Plans (EPPs). The requested changes would revise the FOLs, and Appendices A, B, and C for Unit 1 and Appendices A and B for Unit 2 licenses to reflect a corporate name change, remove obsolete information, and correct typographical errors. The September 8 and November 18, 1997, and January 8 and July 2, 1998, letters provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

The September 8, 1997, letter identified three additional typographical errors that need to be addressed. The November 18, 1997, and July 2, 1998, letters referred to the incorporation of paragraph 2.E, which had previously been approved but inadvertently omitted when Amendment No. 9 was issued by the NRC on August 3, 1988, into the LGS, Unit 1 license. The January 8, 1998, letter withdrew the licensee's request to remove the reference noted in change number 29 in the letter dated February 25, 1997, regarding criticality monitoring.

2.0 EVALUATION

The licensee requested that the licenses be changed to reflect the licensee's name change from Philadelphia Electric Company to PECO Energy Company. The name change will be reflected by alterations in the LGS Unit 1 and Unit 2 FOLs, and Appendices A, B, and C for Unit 1 and Appendices A and B for Unit 2 licenses. In addition, the licensee requested correction of typographical errors and elimination of obsolete information from the LGS Unit 1 and Unit 2 FOLs, and Appendices.

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## 2.1 Name/Title Changes

- a. By letter dated December 21, 1993, the Philadelphia Electric Company informed the NRC that effective January 1, 1994, it was changing its name to PECO Energy Company. PECO Energy Company was not to be a new corporation, or a successor corporation to Philadelphia Electric Company, but it was to remain and continue to be the same company with a different name. As a result, contracts, agreements, obligations, licenses and permits relating to Philadelphia Electric Company would continue to be legal, valid, and binding with respect to PECO Energy Company. This proposed change should have no effect or impact on the regulatory obligations of the licensee under the laws and regulations administered by the Commission, or the licensee's qualifications to hold the license, and should not change in any way the business of the licensee with the Commission. There should be no change in the safety and security of the public from the name change and the applicable antitrust condition will continue to apply. The staff finds the change administrative in nature and therefore acceptable.
- b. Currently, TS Section 6.5.2.2 requires that members of the Nuclear Review Board (NRB) be appointed in writing by the Senior Vice President and Chief Nuclear Officer. PECO Energy recently established the position and title of President and Chief Nuclear Officer as the ranking officer of their Nuclear Business Unit. Therefore, in order to retain the same level of authority, TS Section 6.5.2.2 will be revised to eliminate the words Senior Vice President, thus retaining the same ranking authority for NRB appointments. The staff finds this change administrative in nature and therefore acceptable.
- c. FOL paragraph 2.E was amended by Amendment No. 9 dated August 3, 1988. When Amendment No. 9 was issued, the revised FOL paragraph 2.E was not incorporated directly into the licensee's LGS, Unit 1, FOL. This omission is now being corrected by inserting the revised paragraph 2.E, as approved in Amendment No. 9, in the appropriate page of the LGS, Unit 1 FOL.

## 2.2 Typographical Errors

- a. LGS Unit 1 FOL, paragraph 2.E, contains a spelling error involving the word "Safeguards." This proposed change corrects the spelling error.
- b. LGS Unit 1 and Unit 2 TS Index, page x, contains reference to Table 3.3.7.9.1, "Fire Detection Instrumentation." This Table was removed from the Unit 1 and Unit 2 TSs by TS Amendments 104 and 68, respectively, issued November 20, 1995. Therefore, page x is being corrected accordingly.
- c. LGS Unit 1 and Unit 2 TS Bases Index, page xix, contains reference to Bases Section 3/4.3.8, "Turbine Overspeed Protection System." This Bases Section was removed from the Unit 1 and Unit 2 TSs by TS Amendments 100 and 64, respectively, issued August 24, 1995. Therefore, page xix is being corrected accordingly.

- d. LGS Unit 1 and Unit 2 TS page 3/4 3-8, "Table 4.3.1.1-1," contains typographical and unit consistency errors. The Unit 1 TS's Table, column four, "CHANNEL CALIBRATION," is missing the footnote annotation (a). Unit 1 and Unit 2 TS's Table, footnote (b) reads "...to overlap for a least ½ decades..." However, the footnote should read "...to overlap for at least ½ decades..." The proposed changes correct the noted errors.
- e. LGS Unit 2 TS page 3/4 6-14, "Containment Systems, Surveillance Requirements(SR)," SR 4.6.2.1.e., contains a typographical error not consistent with Unit 1. To be consistent the word "calculation" should be changed to "calculated." This requirement was amended for Unit 1 and Unit 2 TS by TS Amendments 108 and 71, respectively, issued January 25, 1996. The tense of the word was inadvertently in error. Therefore, it is corrected.
- f. LGS Unit 1 and Unit 2 TS page 3/4 6-42, "Table 3.6.3-1 Notation," note 20 contains reference to the MSIV-LCS (Main Steam Isolation Valve - Leakage Control System). This system was physically removed, and therefore removed from Unit 1 and Unit 2 TSs by TS Amendments 107 and 53, respectively, issued January 25, 1996, and February 16, 1995. Therefore, the reference is deleted.
- g. LGS Unit 1 and Unit 2 TS page 3/4 6-43, "Table 3.6.3-1 Notation," note 33 contains reference to the Secondary Containment Isolation Valve Tables 3.6.5.2.1-1, and 3.6.5.2.2-1. These Tables were removed from Unit 1 and Unit 2 TSs by TS Amendments 105 and 69, respectively, issued November 20, 1995. Therefore, the reference is deleted.
- h. LGS Unit 1 TS page 3/4 8-15, "Electrical Power Systems," contains a typographical error. Limiting Condition For Operation (LCO) 3.8.3.1 a. 2. states "Unit 2 Division 2, Consisting of:" the LCO should read "Unit 1 Division 2, Consisting of:" This error occurred in TS Amendment 24, which was issued June 15, 1989. This change will correct the error.
- i. LGS Unit 1 and Unit 2 TS page 6-8, "Administrative Controls," Section 6.5.1.6 contains a typographical error. TS Section 6.5.1.6 "The PROC shall be responsible for:" should read "The PORC shall be responsible for:" This change will correct the wording error.
- j. LGS Unit 1 and Unit 2 TS page 3/4 3-103, "Offgas Gas Monitoring Instrumentation," Action b. requires that an explanation be submitted to the NRC in the next Semiannual Radioactive Effluent Release Report. The frequency for submitting the report was changed from semiannual to annual by TS Amendments 73 and 35 for Unit 1 and Unit 2, respectively, issued August 10, 1994. Therefore, it is changed to reflect the annual frequency.
- k. LGS Unit 1 TS page 3/4 3-57, "Control rod Instrumentation," contains a typographical error. "Surveillance Requirement 4.6.6" should be changed to "Surveillance Requirement 4.3.6." This change will correct the numbering error.
- l. LGS Unit 2 page 3/4 6-45, "Containment Systems," contains a typographical error. Surveillance Requirement 4.6.6.1.b.3 contains the word "oncer" which should be changed to "once". This change will correct the wording error.

- m. LGS Unit 2 page 3/4 8-4, "Electrical Power systems," contains a typographical error. Surveillance requirement 4.8.1.2.c is missing the subsection identifier "1)". This change will correct the error.

The staff finds the above changes editorial in nature and therefore acceptable.

### 2.3 Obsolete Requirements

- a. LGS Unit 1 FOL, Section 2.C.(4), references a requirement pertaining to Qualification of Personnel for a Unit 1 low power license. This requirement was fulfilled and documented in the LGS SER (NUREG-0991 Safety Evaluation Report related to the operation of LGS, Units 1 and 2, dated August 1983), Supplement 4, issued May 1985. Therefore, this requirement of the license is no longer necessary.
- b. LGS Unit 1 FOL, Section 2.C.(5), references a requirement pertaining to ensuring operability of the Emergency Response Capabilities Safety Parameter Display within 30 days after the completion of the 100-Hour Warranty Run. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the license is no longer necessary.
- c. LGS Unit 1 FOL, Section 2.C.(6), references a requirement pertaining to Post-Fuel Loading Initial Test Program. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the license is no longer necessary.
- d. LGS Unit 1 FOL, Section 2.C.(7), references a requirement pertaining to the submittal of the Inservice Inspection Program. This requirement was fulfilled and documented in the LGS SER, Supplement 7, issued April 1989. Therefore, this requirement of the license is no longer necessary.
- e. LGS Unit 1 FOL, Section 2.C.(8), references a requirement pertaining to implementation of commitments applicable to Generic Letter 83-28, "Salem ATWS Event." This requirement was fulfilled and documented in the LGS SER, Supplement 2, issued October 1984, Supplement 8, issued June 1989, and Supplement 9, issued August 1989. Therefore, this requirement of the license is no longer necessary.
- f. LGS Unit 1 FOL, Section 2.C.(9), references a requirement pertaining to submittal of a turbine system maintenance program. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the license is no longer necessary.
- g. LGS Unit 1 FOL, Section 2.C.(12), references a requirement pertaining to modifications to the Remote Shutdown System prior to startup following the first refueling outage. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this requirement of the license is no longer necessary.

- h. LGS Unit 1 FOL, Section 2.C.(14), references a requirement pertaining to connection of the Refueling Floor Volume to the Standby Gas Treatment System. This requirement was fulfilled and documented in the LGS SER, Supplement 7, issued April 1989. Therefore, this requirement of the license is no longer necessary.
- i. LGS Unit 1 FOL, Section 2.C.(15), references a notice pertaining to the potential event that the NRC would find a lack of progress in completion of the Emergency Planning Procedures, which would be subject to 44 CFR Part 350. This notice was not necessary since LGS achieved and maintained an adequate state of emergency preparedness; therefore, this requirement of the license is no longer necessary.
- j. LGS Unit 1 FOL, Section 2.D.(a), references an exemption pertaining to the General Design Criteria (GDC) 61, and the Standby Gas Treatment System operation during the first refueling outage. The time period for this exemption has passed; therefore, this reference in the license is no longer necessary.
- k. LGS Unit 1 FOL, Section 2.D.(b), references an exemption pertaining to GDC 56, and the requirement for additional automatic isolation prior to startup following the first refueling outage. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this reference contained in the license is no longer necessary.
- l. LGS Unit 1 FOL, Section 2.D.(c), references an exemption pertaining to GDC 19, and condition of requiring modifications to the Remote Shutdown System. This requirement was fulfilled and documented in the LGS SER, Supplement 8, issued June 1989. Therefore, this reference contained in the license is no longer necessary.
- m. LGS Unit 1 FOL, Section 2.D.(g), references a one-time exemption pertaining to the performance of local leak rate testing at the first refueling outage. This exemption was documented in the LGS SER Supplement No. 3, Section 6.2.6. The time period for this exemption has passed; therefore, this reference in the license is no longer necessary.
- n. LGS Unit 1 FOL, Section 2.D.(h), references a one-time exemption pertaining to inerting of containment 6 months after initial criticality. This exemption was documented in the LGS SER, Supplement 5, issued July 1985. Unit 2 FOL, Section 2.D.(e), references a one-time exemption pertaining to inerting of containment 6 months after initial criticality. This exemption was documented in the LGS SER, Supplement 9, issued August 1989. The time periods for these exemptions have passed; therefore, these references in the license are no longer necessary and have been deleted.
- o. LGS Unit 1 FOL, Section 2.D.(i), references an exemption pertaining to conduct of a full participation emergency preparedness exercise within one year before issuance of a full power license. This exemption was documented in the LGS SER, Supplement 6, August, 1985. The time period for this exemption has passed; therefore, this reference in the license is no longer necessary.
- p. LGS Unit 1 and Unit 2 TS pages 3/4 5-1, 3/4 5-2, 3/4 6-15, 3/4 6-16, 3/4 7-1, and 3/4 7-3 contain a reference, by means of a footnote, to a one-time (i.e., temporary) change affecting the Allowed Outage Times (AOT) for Emergency Service Water,

- d. LGS Unit 1 and Unit 2 TS page 3/4 3-8, "Table 4.3.1.1-1," contains typographical and unit consistency errors. The Unit 1 TS's Table, column four, "CHANNEL CALIBRATION," is missing the footnote annotation (a). Unit 1 and Unit 2 TS's Table, footnote (b) reads "...to overlap for a least ½ decades..." However, the footnote should read "...to overlap for at least ½ decades..." The proposed changes correct the noted errors.
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Residual Heat Removal Service Water, Residual Heat Removal and Core Spray Systems. Unit 1 TS Amendment 86 issued on January 27, 1995, and Unit 2 TS Amendment 70 issued on November 30, 1995, incorporated the footnotes. This allowance was necessary to perform modifications to the systems and was permitted one time during the Unit 2 third refueling outage (i.e., January 1995) and one time during the Unit 1 sixth refueling outage (i.e., January 1996). Since the modifications are complete on both units and the time period for this allowance has passed, these references in the TSs are no longer necessary.

The staff finds the above deletions administrative in nature and therefore the changes are acceptable.

Revisions of affected Appendices to reflect the name change are appropriate and therefore acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (62 FR 30642). The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusions set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

With respect to the proposed name change, pursuant to 10 CFR 51.21, 51.32, and 51.35, an Environmental Assessment and Finding of No Significant Impact have been prepared and published in the Federal Register on (63 FR 55154). Accordingly, based on the environmental assessment, the staff has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: B. Buckley

Date: October 23, 1998