

[7509-01]

UNITED STATES NUCLEAR REGULATORY COMMISSION

PHILADELPHIA ELECTRIC COMPANY

(LIMERICK GENERATING STATION, UNIT 1)

ISSUANCE OF DIRECTOR'S DECISION UNDER 10 CFR §2.206

Notice is hereby given that the Director, Office of Nuclear Reactor Regulation, has issued a decision concerning certain pleadings submitted to the Commission by Robert L. Anthony/Friends of the Earth on the Delaware Valley. The pleadings requested that the Commission stay the effectiveness of License Amendment No. 1 issued to the Philadelphia Electric Company on February 6, 1986. The Amendment extended the surveillance intervals for the testing of certain instrumentation line excess flow check valves in the Limerick Generating Station, Unit 1.

The Director, Office of Nuclear Reactor Regulation, has determined to deny the request for stay. The reasons for this decision are explained in the "Director's Decision Under 10 CFR 2.206", DD-86-06, which is available for public inspection in the Commission's Public Document Room, 1717 H Street, N.W., Washington, DC, and at the Local Public Document Room at the Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania.

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A copy of the Decision will be filed with the Secretary for the Commission's review in accordance with 10 CFR 2.206(c). As provided in this regulation, the Decision will constitute the final action of the Commission twenty-five (25) days after issuance, unless the Commission, on its own motion, institutes review of the Decision within that time period.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by

Darrell G. Eisenhut, Acting Director  
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland  
this 13th day of May 1986.

\*Previously concurred:

PD#4/PM	PD#4/LA
*REMartin:lb	*MO'Brien
04/17/86	04/18/86

PD#4/D  
\*WButler  
04/18/86

OELD  
\*  
04/28/86

DD/BWR  
WHouston  
5/6/86

D/BWR RB  
RBernero  
5/7/86

DD/NRR  
DEisenhut  
5/13/86

D/NRR  
HDenton  
1/86

May 14, 1986

DISTRIBUTION  
Docket File 50-352  
PD#4 Reading  
RMartin  
MO'Brien  
Fingram, PA

DOCKET NO. 50-352

MEMORANDUM FOR: Rules and Procedures Branch, John Phillips, Chief  
Division of Rules and Records  
Office of Administration

FROM: Office of Nuclear Reactor Regulation

SUBJECT: PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNIT 1

One signed original of the *Federal Register* Notice identified below is enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies ( 5 ) of the Notice are enclosed for your use.

- ☐ Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- ☐ Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s); Time for Submission of Views on Antitrust Matters.
- ☐ Notice of Consideration of Issuance of Amendment to Facility Operating License.
- ☐ Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- ☐ Notice of Availability of NRC Draft/Final Environmental Statement.
- ☐ Notice of Limited Work Authorization.
- ☐ Notice of Availability of Safety Evaluation Report.
- ☐ Notice of Issuance of Construction Permit(s).
- ☐ Notice of Issuance of Facility Operating License(s) or Amendment(s).
- ☐ Order.
- ☐ Exemption.
- ☐ Notice of Granting Exemption.
- ☐ Environmental Assessment.
- ☐ Notice of Preparation of Environmental Assessment.

☒ Other: Notice of Issuance of Director's Decision Under 10 CFR 2.206

Office of Nuclear Reactor Regulation

Enclosure:  
As stated

Contact: M. O'Brien  
Phone: x29480

OFFICE	PD#4					
SURNAME	MO'Brien					
DATE	05/14/86					

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5/6/86

D/BWR
RBernero
5/17/86

DD/NRR
DEisenhut
5/13/86

D/NRR
HDenton
/ /86



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORT AMENDMENT NO. 1 TO FACILITY OPERATING LICENSE NO. NPF-39  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNIT NO. 1  
DOCKET NO. 50-352

1.0 Introduction

By letter dated December 18, 1985, the Philadelphia Electric Company (the licensee) requested a one-time-only approval for temporarily extending certain surveillance requirements in the Technical Specifications, which must be performed nominally every 18 months and which can only be done when the plant is shutdown. The change would extend the 18 month surveillance interval by 14 weeks beyond the maximum 25 percent extension allowed by the Technical Specifications. This would permit the licensee to delay performing this testing until a maintenance and surveillance outage which will begin on or before May 26, 1986.

2.0 Evaluation

Technical Specification (TS) 4.6.3.4 requires that instrumentation line excess flow check valve surveillance tests be performed at a nominal frequency of once per 18 months. Since the Limerick Unit 1 plant has been through an extended startup program schedule, which included relatively little startup testing program activity from about April to early August 1985, the scheduled surveillance tests fall in a period of what would otherwise be a continuation of first fuel cycle power operations. Since the plant must be shutdown for about two weeks to perform these tests and since the licensee plans to shut the plant down on or before May 26, 1986 to perform other surveillance tests and maintenance activities the licensee proposes to extend the surveillance interval for the excess flow checkvalves to allow those tests to also be performed during the outage to begin on or before May 26, 1986.

The 18 month surveillance interval was selected to be consistent with the maximum anticipated interval between refueling outages. However, TS 4.0.2 does allow the time interval between surveillance testing to be extended by 25 percent in order to provide flexibility in operations scheduling. The end of the most limiting surveillance interval, including the allowable 25 percent extension for the excess flow checkvalves in TS 4.6.3.4 (Table 3.6.3-1) is February 19, 1986. Therefore, the temporary TS change would extend the permissible time to perform these tests from approximately 23 months to approximately 26 months.

The requirements of the TS for testing nominally every 18 months for which extensions are proposed and the reason these tests can only be performed while the reactor is shutdown are as follows. The excess flow check valves in TS Table 3.6.3-1 are provided in instrumentation lines for the purpose of checking flow in the line when subjected to an excessive differential pressure.

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Testing of the valves to verify that they check flow involves opening of the instrumentation line downstream of the valve with the reactor coolant system cold and pressurized and verifying that the valves check flow. This operation cannot be performed during normal power operation for the following reasons: (1) the performance of the test with the reactor coolant system hot, pressurized and at power would involve potential hazards to testing personnel upon opening of the line in the unlikely event that one of the valves fails to check and releases fluid that is both at a high temperature and radioactive, and (2) the opening of the instrumentation line, since the line may serve an instrumentation manifold with multiple transmitters, would result in multiple engineered safety feature system and/or reactor protection system actuations which would either constitute conditions prohibited by Technical Specifications or result in a shutdown of the reactor.

The safety related aspects of extending this surveillance interval on a one time basis for about three months are insignificant for the following reasons. • (1) Flow through the valves or from the lines in which they are located will be limited by the small line size and the provision of flow restricting orifices to further reduce potential flow rates, (2) Any leakage from these lines outside of primary containment would be contained in the secondary containment and processed by the standby gas treatment system. The analysis of such an event has already been performed and is included in the Final Safety Analysis Report in Section 15.6.2. As indicated in the FSAR there would likely be a variety of indicators to the operator of a failed instrument line thus alerting plant staff to the need to isolate the line by use of other manual valves in the line. The staff has previously reached the conclusion in section 15.6 of the SER that the Limerick instrument line design is acceptable. (3) The licensee has examined the records of the initial flow testing performed on these valves and found that all valves were tested successfully. The licensee further states that, based on available data, the valves are believed to be highly reliable in performing their function of checking flow. The staff concludes that the condition of the valves is not expected to change significantly during the short extension period.

Based on the above, the NRC staff concludes that extension of the interval for the surveillance testing by 14 weeks on a one-time-only basis is acceptable because the increased surveillance interval does not significantly increase the possibility that an undetected failure will occur in the instrumentation line excess flow check valves covered by this Technical Specification.

### 3.0 Environmental Consideration

This amendment changes some surveillance requirements on a one-time-only basis. The staff has determined that the amendment involves 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 this amendment involves no significant hazards consideration and there has been no public comment on such finding within the time provided by the Federal Register notice of consideration of the licensee's amendment request. Thus, there is no need to make a final determination regarding no significant hazards consideration. Accordingly, this amendment meets the

eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of this amendment.

#### 4.0 Conclusion

The staff 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributors: R. E. Martin, S. Kucharski, J. S. Guo, J. Page

Dated: FEB 06 1986





THE ADVISORY PANEL FOR THE DECONTAMINATION OF  
THREE MILE ISLAND UNIT 2

July 22, 1985

Nunzio J. Palladino, Chairman  
U. S. Nuclear Regulatory Commission  
1717 'H' Street, N. W.  
Washington, D. C. 20555

Dear Chairman Palladino:

At the June 20th meeting between the Advisory Panel for the Decontamination of TMI-2 and the Nuclear Regulatory Commission we expressed concern over the fact that the Commission had not completed the pending TMI-2 enforcement action. At the meeting Ms. Jane Axelrod explained that in "regard to the Parks matter, the staff has forwarded its recommended enforcement action to the Commission for action, and it is pending a decision there." When asked how long it will be before a decision is made, you stated that "I can set targets. I can't make guarantees. But I think this is one that deserves prompt Commission action, and I would urge all of us to get to it and try to get it done within the next seven days."

It was reported at the July 18th meeting of our Advisory Panel that you had not yet taken action on the Parks matter. On behalf of the Panel I wish to express real disappointment at the NRC's failure to deal with this matter in a timely fashion. We have stressed time and time again how important it is to the entire cleanup process for the Commission to conclude appropriate enforcement. It takes a great deal of time to conclude the investigation and the enforcement action recommendation - that is what makes it so important for the Commission to avoid unnecessary delays.

It seems to me that this is an area in which the Commission can show its desire to ensure that the law and regulations governing nuclear power plants is not to be violated and to set an example of swift action when violations take place. Truly, the lack of timeliness makes a mockery out of the regulations and brings into question the effectiveness of the Commission in dealing with operators of power plants. Without penalties there is no teeth in the regulations and as such no checks and balances exist. Obviously, we are extremely disappointed with your failure to follow-up on this matter and urge you to promptly conclude same.

Sincerely,

*Arthur E. Morris*  
Arthur E. Morris, Mayor  
Chairman

cc: Mike Masnik  
Panel Members

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

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*SL*

EDO PRINCIPAL CORRESPONDENCE CONTROL  
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FROM:

DUE: 08/07/85

EDO CONTROL: 000876

DOC DT: 07/22/85

FINAL REPLY:

ARTHUR E. MORRIS  
THE ADVISORY PANEL FOR DECONTAMINATION  
OF THREE MILE ISLAND UNIT 2

TO:

CHAIRMAN PALLADINO

FOR SIGNATURE OF:

\*\* PRIORITY \*\*

SECY NO: 85-627

CHAIRMAN

DESC:

ROUTING:

EXPRESSES CORNER NRC HAS NOT YET TAKEN ENFORCEMENT  
ACTION ON "PARKS" MATTER RELATING TO TMI-2

DIRCKS

ROE

~~REHM~~

STELLO

DENTON

MURLEY

ELD

DATE: 07/29/85

ASSIGNED TO: IE

CONTACT: TAYLOR

SPECIAL INSTRUCTIONS OR REMARKS:

## CORRESPONDENCE CONTROL TICKET

SECY NUMBER: 85-627

LOGGING DATE 7/26/85

## OFFICE OF THE SECRETARY

ACTION OFFICE: EDO

AUTHOR: Arthur Morris, Chairman

AFFILIATION: Advisory Panel for the Decontamination of TMI-2

LETTER DATE: 7/22/85

FILE CODE \_\_\_\_\_

ADDRESSEE: Palladino

SUBJECT: Expresses concern NRC has not yet taken enforcement action on "Parks" matter relating to TMI-2.

ACTION: Prepare response for Chm's signature. Suspense: 8/7

DISTRIBUTION: Chm, Cmrs, PE, GC, CA, PA, SECY, RF.

SPECIAL HANDLING:

SIGNATURE DATE:

FOR THE COMMISSION TRC

Rec'd Off. EDO  
Date... 7-29-85  
Time... 2:00 p

EDO --- 000876