



**PECO NUCLEAR**

A Unit of PECO Energy

Station Support Department

10 CFR 50.90  
10 CFR 20.1601

PECO Energy Company  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

January 04, 1999

Docket Nos. 50-352  
50-353

License Nos. NPF-39  
NPF-85

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 and 2  
Technical Specifications Change Request No. 97-01-01  
Radiation Protection Administrative Changes

Dear Sir / Madam:

PECO Energy Company (PECO Energy) is submitting Technical Specifications (TS) Change Request No. 97-01-01, in accordance with 10 CFR 50.90, requesting a change to TS (i.e., Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2. In addition, PECO Energy is requesting approval of alternative methods for controlling access to high radiation areas in accordance with 10 CFR 20.1601.

The proposed changes will revise the Administrative Section of TS pertaining to controlled access to high radiation areas and the report dates for the Annual Occupational Radiation Exposure Report and the Annual Radioactive Effluent Release Report.

Information Supporting this TS Change Request is contained in Attachment 1 to this letter, and copies of the "marked-up" and "camera-ready" Technical Specifications pages are contained in Attachment 2. This information is being submitted under affirmation, and the required affidavit is enclosed.

We request that if approved, the changes be issued by April 30, 1999, and become effective within 30 days of issuance.

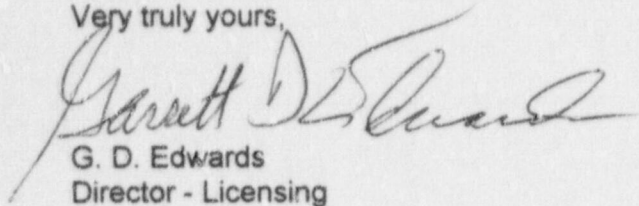
If you have any questions, please do not hesitate to contact us.

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P PDR

January 04, 1999

Page 2

Very truly yours,

A handwritten signature in cursive script, appearing to read "G. D. Edwards".

G. D. Edwards  
Director - Licensing

Attachments

Enclosure

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachment, enclosure)  
A. L. Burritt, USNRC Senior Resident Inspector, LGS

COMMONWEALTH OF PENNSYLVANIA

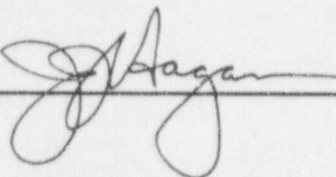
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: SS

COUNTY OF CHESTER

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J. J. Hagan, being first duly sworn, deposes and says: That he is Vice President of PECO Energy Company, the Applicant herein, that he has read the enclosed Technical Specifications Change Request No. 97-01-01 "Radiation Protection Administrative Changes," for Limerick Generating Station, Unit 1 and Unit 2, Facility Operating License Nos. NPF-39 and NPF-85, 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.

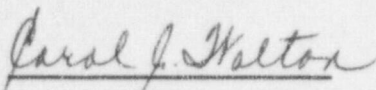


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Subscribed and sworn to

before me this 30<sup>th</sup> day

of Dec. 1998.



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Notary Public





**ATTACHMENT 1**

**LIMERICK GENERATING STATION  
UNITS 1 AND 2**

**DOCKET NOS.**

50-352

50-353

**LICENSE NOS.**

NPF-39

NPF-85

**"Radiation Protection Administrative Changes"**

**Information Supporting Changes - 3 Pages**

## DISCUSSION AND DESCRIPTION OF THE PROPOSED CHANGES

PECO Energy Company (PECO Energy) is requesting Technical Specifications (TS) changes which will revise the Administrative Section of TS pertaining to controlled access to High Radiation Areas, and the reporting dates for the Annual Occupational Radiation Exposure Report and the Annual Radioactive Effluent Release Report. These changes reflect current NRC requirements and guidance. Specifically, 10CFR20.1601(c) allows alternative methodologies to control access to high radiation areas, 10CFR20.2206 requires that the Annual Occupational Radiation Exposure Report be submitted before April 30 of each year, and NUREG 1433 establishes TS text language for the Annual Radiological Effluent Release Report.

The following TS changes are being proposed:

- TS Section 6.12, 6.12.1, and 6.12.2 will be changed to: clarify requirements; incorporate additional monitoring options (to allow dosimetry and video monitoring) for entry into high radiation areas; add the requirement that all individuals entering a high radiation area have knowledge of the dose rates in the area; and add the requirement that locked high radiation controls apply to each individual entering the area.
- TS Sections 6.9.1.4, 6.9.1.5(a), and 6.9.1.8 will be changed to: support changes to the NRC reporting dates; reference 10CFR20.2206; delete current reporting dates, and correct a typographical error.

## SAFETY ASSESSMENT

Limerick Generating Station (LGS) Technical Specifications (TS) Section 6.12, "High Radiation Areas," is based on the former 10CFR20 that was in effect until December 31, 1993. As of January 1, 1994, 10CFR20.1601(c) provides the provision that a licensee may apply to the Commission for approval of alternative methods for controlling access to high radiation areas. In addition, NRC Regulatory Guide 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," dated June 1993, provides guidance on establishing alternative methods for access control. In accordance with 10CFR20.1601(c) and as outlined in Regulatory Guide 8.38, PECO Energy is requesting approval of alternative methods for access control to high radiation areas as delineated in Attachment 2, for LGS Units 1 and 2. The former regulations required high radiation area doors be locked, have a control device to reduce the radiation levels in the room if the doors are open, or provide an alarm signal to warn personnel of the higher radiation levels. The proposed TS changes will authorize alternative methods for monitoring individuals in high radiation areas to include newer technology such as teledosimetry and closed circuit cameras. The proposed changes will delete the requirement to set a maximum stay time, but use alternative methods to control the entry, such as the use of an integrating alarming dosimeter and the use of a "stay dose". The proposed controls are in accordance with regulatory guidance and exercise positive control

over high radiation area entries. Lastly, the proposed controls will continue to prevent exceeding federal or administrative limits.

In addition, LGS TS Section 6.9, "Routine Reports," is also based on the former 10CFR20 that was in effect until December 31, 1993. LGS TS Section 6.9.1.4 is being revised to allow changes to TS Sections 6.9.1.5(a) and 6.9.1.8, and are administrative in nature. The proposed changes to TS Section 6.9.1.5(a), "Annual Occupational Radiation Exposure Report," will move the submittal date of the report from March 1 to April 30, and reflect the current requirements of 10CFR20.2206. This change to the report date has no impact on the report range (i.e., 12 months), dose measurement requirements, dose tabulations or Regulatory/Administrative dose limits for personnel. The proposed changes to TS Sections 6.9.1.8, "Annual Radioactive Effluent Release Report," will move the report submittal date from March 1 to May 1, and has no impact on the report range (i.e., 12 months), ODCM sampling requirements, dose calculations, radiation monitor set points, or Regulatory/Administrative dose limits. These changes also reflect the current requirements of 10CFR20 and the Annual Radioactive Effluent Release Report will be common with the Peach Bottom Atomic Power Station submittal date. Finally, TS Section 6.9.1.5.a is being revised to correct a typographical error.

By letter dated May 8, 1998 PECO Energy submitted a duplicate Annual Effluent Release Report (i.e., No. 23) for the period January 1, 1997 to December 31, 1997 in order to establish a May 1st report submittal date in anticipation of this TS Change Request and in order to comply with 10CFR50.36(a). If NRC approval of this TS Change Request is not obtained by April 30, 1999, PECO Energy will again provide a duplicate submittal in May 1999 anticipating NRC approval prior to April 30, 2000.

#### INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

We have concluded that the proposed changes to the Limerick Generating Station (LGS), Unit 1 and Unit 2, Technical Specifications (TS) which will make changes regarding the Radiation Protection Administrative Section of TS, do not involve a Significant Hazards Consideration. In support of this determination an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

1. The proposed TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The changes are administrative in nature and do not impact the operation, physical configuration, or function of plant equipment or systems. The changes do not impact the



initiators or assumptions, of analyzed events, nor do they impact mitigation of accidents on transient events. Therefore, these changes do not increase the probability of occurrence or consequences of an accident previously evaluated in the SAR.

2. The proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes are administrative in nature and do not alter plant configuration, require that new equipment be installed, alter assumptions made about accidents previously evaluated, or impact the operation or function of plant equipment. Therefore, these changes do not create the possibility of a new or different kind of accident than previously evaluated.

3. The proposed TS changes do not involve a significant reduction in a margin of safety.

The proposed changes are administrative in nature and do not impact any safety assumptions, or potentially reduce any margin of safety as described in the LGS TS basis. The proposed changes have no impact on any safety analysis assumptions. Therefore, these changes do not involve any reduction in a margin of safety.

#### INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

An Environmental Assessment is not required for the Technical Specifications changes proposed by this TS Change Request because the requested changes to the Limerick Generating Station, Unit 1 and Unit 2, TS conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The proposed TS changes do not involve a Significant Hazards Consideration as discussed in the preceding safety assessment section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. In addition, the proposed TS changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

#### CONCLUSION

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Limerick Generating Station, Unit 1 and Unit 2, Technical Specifications, and have concluded that they do not involve an unreviewed safety question, they do not involve a Significant Hazards Consideration, and they will not endanger the health and safety of the public.

**ATTACHMENT 2**

**LIMERICK GENERATING STATION  
UNITS 1 AND 2**

**LICENSE CHANGE REQUEST  
NO. 97-01-01**

**AFFECTED PAGES**

**UNIT 1**

6-15  
6-16  
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**UNIT 2**

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