

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY : Docket 50-352

APPLICATION FOR AMENDMENT
OF
FACILITY OPERATING LICENSE
NPF-39

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Philadelphia Electric Company, Licensee under Facility Operating License NPF-39 for Limerick Generating Station Unit 1, hereby requests that the Technical Specifications contained in Appendix A to the Limerick operating license be amended as indicated by a vertical bar in the margin of the attached pages 3/4 4-15, B 3/4 4-4 and Page 6-16.

Licensee proposes to incorporate the NRC model Technical Specifications provided with Generic Letter 85-19 regarding the requirements for reporting of iodine spikes. The Commission Staff has provided guidance for the reporting requirements of iodine spikes and has determined that because of the improved quality of nuclear fuel during the past decade, normal reactor

coolant iodine activity levels have been maintained well below the regulatory limits now in effect.

Safety Significance

In an effort to eliminate unnecessary Technical Specification requirements, the Commission Staff in Generic Letter No. 85-19, determined that some of the existing requirements regarding iodine may be eliminated. The Limerick Technical Specifications require plant shutdown if the coolant iodine activity limits are exceeded for 800 hours in any 12-month period. In addition to providing for elimination of the existing requirements with regard to plant shutdown, Generic Letter No. 85-19 also provides guidance for the reporting requirements of coolant iodine activity levels, changing the reporting requirements from a short term Special Report or a Licensee Event Report, to an item which is to be included in an annual report, pursuant to the proposed administrative control 6.9.1.6 paragraph (d) on page 6-16.

Further, page 3/4 4-16 has been left intentionally blank in order to maintain the existing pagination throughout the Technical Specifications. Previously, page 3/4 4-16 continued the action items of paragraph 3.4.5, which Licensee proposes to eliminate. Also, page 6-16a has been added because of the additional paragraph (d) on page 6-16. In order to incorporate the additional paragraph it is necessary to add an additional page 16a. The (a) designation is used in order to maintain consistent pagination throughout the Technical Specifications.

The safety significance regarding elimination of some of the requirements for Iodine is minimal. The existing regulations (Title 10 CFR 50.73 Section (b)(1)(ii)) requires the Licensee to report fuel cladding failures. The fuel cladding design improvements have minimized fuel cladding failures which in the past have been the primary cause for high Iodine levels in the reactor coolant.

Further, the specific Iodine activity limitations for the reactor coolant are not being changed and with the existing surveillance requirements, adequate assurance is provided to preclude approaching the specific Iodine limits. Excessive specific activity levels in the reactor coolant would be detected by the existing surveillance requirements in sufficient time to allow the operators to take corrective actions to minimize the activity levels and maintain the Iodine levels below the limits.

Significant Hazards Consideration Determination

Examples of amendments that are considered likely, and also not likely, to involve Significant Hazards Considerations were provided by the Commission (48 FR 14870) and include example (iv) as an example of relief granted upon demonstration of acceptable operation from an operating restriction that was imposed because acceptable operation had not yet been demonstrated. The proposed changes to pages 3/4 4-15, 3/4 4-16, B 3/4 4-4, 6-16, and 6-16a, have been previously justified, and fit into the category of example (iv) as amendments which are not likely to involve Significant Hazards Considerations. In order to support the No Significant Hazards Consideration

determination, necessary background supporting information is provided below, along with an evaluation of each of the three standards set forth in 10CFR Section 50.92.

- (1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because during the past decade, the normal coolant iodine activity in Boiling Water Reactors has been maintained at very low levels due to superior fuel and fuel cladding design along with improved operating practices that decrease the probability of cladding failures. Cladding failures previously caused periodic high iodine levels which are no longer evident in BWR reactor coolant. Further, the existing regulation, 10CFR Section 50.72(b)(1)(ii), requires that the Nuclear Regulatory Commission be immediately notified of fuel cladding failures that exceed expected values or that are caused by unexpected factors.

- (2) The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated, because acceptable operation has been demonstrated over the past decade due to improved design and manufacturing of nuclear fuel, demonstrating the capability that reactor coolant iodine levels are being maintained well below the limit; thereby reducing the coolant iodine levels which were common in the period 1965 to 1975 because of fuel cladding failures.

Changing the reporting requirements does not create the possibility for a new type of accident from any previously evaluated.

- (3) The proposed change does not involve a significant reduction in a margin of safety because surveillance requirements provide adequate assurance that excessive specific activity levels in the reactor coolant will be detected in sufficient time to allow the operators to take corrective action. The specific iodine activity limitations of the reactor coolant have not been changed, and with good fuel management, as has been demonstrated in the past, combined with existing reporting requirements for fuel cladding failures, should preclude ever approaching the specific iodine activity limit.

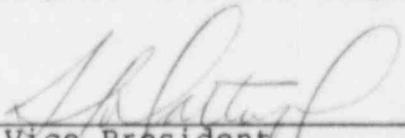
Environmental Consideration

This amendment concerns the reporting requirements of iodine spikes and incorporates the NRC model technical specifications provided with Generic Letter 85-19. Based on the discussions above in regards to improved fuel cladding design and operating experience over the last decade, the proposed changes to the Technical Specifications involves no significant increase in the amount and no significant change in the types of any effluents that may be released offsite and there is no significant increase in individual or cumulative occupational

radiation exposures. The proposed changes will not result in any decrease in the safe operation of the plant.

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Technical Specifications and have concluded that they do not involve unreviewed safety questions or involve Significant Hazards Considerations and will not endanger the health and safety of the public.

Respectfully Submitted
Philadelphia Electric Company



Vice President

COMMONWEALTH OF PENNSYLVANIA :

: SS.

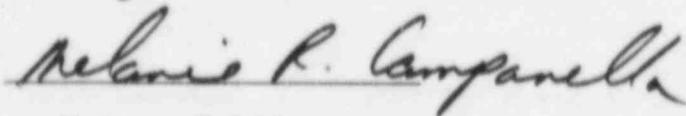
COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating License 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.



Subscribed and sworn to
before me this 19th day
of August, 1986



Notary Public

MELANIE R. CAMPANELLA
Notary Public, Philadelphia, Philadelphia Co.
My Commission Expires February 12, 1990

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of : Docket No. 50-352
: PHILADELPHIA ELECTRIC COMPANY :
: (Limerick Generating Station, :
Unit No. 1) : :

CERTIFICATE OF SERVICE

I hereby certify that copies of Philadelphia Electric Company's Application for Amendment of Facility Operating License NPF-39 in the above-captioned matter were served on the following by deposit in the United States mail, first-class postage prepaid on this 19th day of August, 1986.

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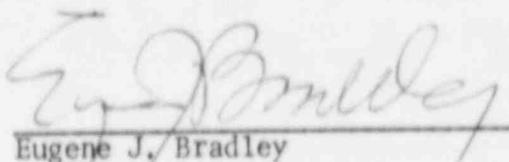
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