Station Support Department

10 CFR 50.90

PECO NUCLEAR A Unit of PECO Energy

965 Chesterbrook Bouley Wayne, PA 19087-5691

September 2, 1997

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. 96-20-0

Gentlemen:

PECO Energy Company is submitting Technical Specifications (iS) Change Request No. 96-20-0, in accordance with 10 CFR 50.90, requesting an amendment to the TS (Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. The proposed changes to the LGS, Units 1 and 2, TS involve revising TS Section 4.0.5, and Bases Sections B 4.0.5 and B 3/4.4.8, regarding the surveillance requirements associated with Inservice Inspection (ISI) and Inservice Testing (IST) of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components. The proposed TS changes are consistent with the guidance delineated in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," and NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants BWR/4." As a result, the proposed TS changes will provide for additional flexibility in implementing the LGS, Units 1 and 2, ISI and IST Programs more consistently with current NRC guidance. Information supporting this TS Change Request is contained in Attachment 1 to this letter, and copies of the marked-up TS pages for the LGS, Units 1 and 2, TS are provided in Attachment 2. This TS Change Request is being submitted under affirmation, and the required affidavit is enclosed.

We request that, if approved, the amendments to the LGS, Units 1 and 2, TS be issued prior to February 28, 1998, and become effoctive within "" days following issuance.

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

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PDR

G. A. Hunger, Jr.J **Director** - Licensing

Attachments Enclosure

CC:

ADIN

H. J. Miller, Administrator, Region I, USNRC (w/ attachments, enclosure) N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ attachments, enclosure) R. R. Janati, Director, PA Bureau of Radiological Protection (w/ attachments, enclosure) 09160 60 71 970902 ADOCK 05000352

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CHESTER

J. B. Cotton, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the foregoing supporting information for Technical Specifications Change Request No. 96-20-0 for Limerick Generating Station, Units 1 and 2, Facility Operating License Nos. NPF-39 and NPF-85, to revise the surveillance requirements associated with Inservice Inspection and Inservice Testing activities, 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.

85.

John Blot

Vice President

Subscribed and sworn to before me this 28⁴⁴ day cf august 1997.

august 1997. Jothy J. Wilson

Notary Public

Notarial Seal Cathy L. Wilson, Notary Public Tredyffrin Twp., Chester County My Commission Expires July 23, 2001

Member, Pennsylvania Association of Notaries

ATTACHMENT 1

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LIMERICK GENERATING STATION

UNITS 1 AND 2

Docket Nos. 50-352 50-353 License Nos. NPF-39 NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

No. 96-20-0

"Revise the Technical Specifications Surveillance Requirements Associated with Inservice Inspection and Inservice Testing of ASME Code Class 1, 2, and 3 Components

Supporting Information for Changes - 4 pages

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PECO Energy Company, Licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively, requests that the Technical Specifications (TS) contained in Appendix A to the Operating Licenses be amended as proposed herein to modify TS Section 4.0.5, and Bases Sections B 4.0.5 and B 3/4.4.8, regarding the su-veillance requirements associated with Inservice Inspection (ISI) and Inservice Testing (IST) of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components. The proposed TS changes are consistent with the guidance delineated in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," and NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants BWR/4." As a result, the proposed TS changes will provide for additional flexibility in implementing the LGS, Units 1 and 2, ISI and IST Programs more consistently with current NRC guidance. The proposed changes to the TS are indicated on the attached marked-up TS pages contained in Attachment 2 to this letter.

We request that, if approved, the TS changes proposed herein be issued by February 28, 1998, and become effective within 30 days following issuance.

This TS Change Request provides a discussion and description of the proposed TS changes, a safety assessment of the proposed TS changes, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

Discussion and Description of the Proposed Changes

This proposed TS Change Request revises TS Sections 4.0.5, and Bases Sections B 4.0.5 and B 3/4.4.8, for Limerick Generating Station (LGS), Units 1 and 2, pertaining to the surveillance requirement associated with Inservice Inspection (ISI) and Inservice Testing (IST) activities for American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Class 1, 2, and 3 components.

The existing wording in TS Section 4.0.5, and Bases Sections B 4.0.5 and B 3/4.4.8, stipulates that ISI and IST surveillance activities for ASME Code Class 1, 2, and 3 components be conducted in accordance with the requirements of Section XI of the ASME Code as required by 10CFR50.55a(g). The proposed changes will revise the applicable TS sections to only make reference to 10CFR50.55a, since the current regulations have separated the specific requirements for ISI and IST into sections 50.55a(g) and 50.55a(f), respectively.

The existing wording of TS Section 4.0.5, and Bases Sections B 4.0.5 and B 3/4.4.8, also requires that ISI and IST surveillance activities be conducted in accordance with the requirements of Section XI of the ASME Boiler and Pressure Vessel Code, except where specific written relief has been granted by the NRC. This wording precludes the immediate implementation of alternative testing in the event that a Code required inspection has been identified as clearly impractical. The proposed TS changes will revise the applicable TS sections to eliminate the requirement that written relief be obtained prior to implementation of alternative testing during the initial 120-month inspection interval, and the initial 12 months of subsequent intervals in cases where the Code required inspections have been found to be clearly impractical. NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," discusses impracticality as being a situation where a test cannot be performed due to limitations in design (which includes prohibitive dose rates), construction, or system configuration.

Furthermore, TS Section 4.0.5b. currently discusses the required frequency of ISI and IST surveillance activities required by the ASME Code. The existing TS address testing frequencies of up to one (1) year. In some cases, the ASME Code requires that testing be performed on a two (2) year frequency. The proposed TS changes will also revise the TS to include a reference for tests that are conducted on a

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biennial frequency. Inclusion of this reference will permit the application of TS 4.0.2 criteria for ISI and IST surveillance activities. This will permit a 25 percent time extension to be applied to the surveillance frequency, if necessary, in order to allow for consideration of plant operating conditions when scheduling ISI and IST surveillance tests.

Safety Assessment

The proposed TS changes do not involve any physical modifications to the plant structures, systems, or components. The proposed TS changes are considered administrative in nature, and are intended to remove inconsistencies between the LGS TS and requirements stipulated in 10CFR50.55a. The proposed TS changes do not alter the program currently described in TS Section 6.8, "Procedures and Programs," for implementing the ISI and IST Programs at LGS. All ISI and IST surveillance activities will continue to be performed in accordance with the requirements of Section XI of the ASME Code, with the exception of cases where written relief has been previously granted by the NRC. In the event that a Code required inspection or test is found to be impractical due to unforeseen conditions, written relic." will still be requested from the NRC; however, implementation of the alternate testing may proceed, if appropriate. It is anticipated that the only time this provision would be utilized would be in the event that an inspection or test is discovered to be impossible or impractical to perform due to unforeseen or unexpected high radiation conditions, or physical limitations. This change will also clarify the applicability of surveillance intervals to biennial tests or examinations. No ASME Code required inspections will be eliminated from the ISI or IST Programs until approval has been granted by the NRC. The proposed TS changes do not reduce any margin of safety as described in the Safety Analysis Report (SAR), or constitute an unreviewed safety question.

In addition, the proposed TS changes are consistent with guidance provided in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," and NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants BWR/4." In particular, NUREG-1482 discusses impracticality as being a situation where a test cannot be performed due to limitations in design (which includes prohibitive dose rates), construction, or system configuration.

Therefore, the proposed TS changes will remove the inconsistencies between the LGS TS and the requirements of 10CFR50.55a, and will also ensure that the implementation of the LGS ISI and IST Programs are consistent with current NRC guidance as specified in NUREG-1482 and NUREG-1433, Revision 1.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) Section 4.0.5, and Bases Sections B 4.0.5 and B 3/4.4.8 concerning the surveillance requirements associated with Inservice Inspection (ISI) and Inservice Testing (IST) of American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components 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 Technical Specifications (TS) changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS changes are administrative in nature and do not make physical modifications or changes to the plant structures, systems, or components (SSC). Plant SSC will continue to function as designed. The proposed TS changes will not alter equipment operational practices or procedures.

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In the event that an ASME Section XI Code required inspection or test is found to be impractical due to unforeseen conditions, written relief would still be requested from the NRC in accordance with established procedures. No code required inspection will be eliminated from the ISI or IST Programs until written approval has been granted by the NRC as required 10CFR50.55a. It is anticipated that the only time this provision would be utilized would be in the event that an inspection or test is discovered to be impossible or impractical to perform due to unforeseen or unexpected high radiation conditions, or physical limitations. This change will also clarify the applicability of surveillance intervals to biennial tests or examinations.

The proposed TS changes will remove the inconsistencies between the LGS TS and the requirements of 10CFR50.55a, and will also ensure that the implementation of the LGS ISI and IST Programs are consistent with current NRC guidance as specified in NUREG-1482 and NUREG-1433, Revision 1.

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

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 apply to the administrative requirements for testing of plant systems. No physical modifications to systems or components are involved. No new failure modes which could cause or contribute to the cause of an accident are being introduced.

The proposed TS changes will remove the inconsistencies between the LGS TS and the requirements of 10CFR50.55a, and will also ensure that the implementation of the LGS ISI and IST Programs are consistent with current NRC guidance as specified in NUREG-1482 and NUREG-1433, Revision 1.

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

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

¹ hysical plant modifications or operational procedure changes are being made as a result proposed TS changes. The proposed TS changes apply to the ISI and IST Programs' aillance requirements and do not modify the scope or frequency of these Programs as required by 10 CFR 50.55a. The proposed TS changes will eliminate inconsistencies between current TS wording and the requirements specified in 10CFR50.55a. In addition, the proposed changes are consistent with the guidance stipulated in NUREG-1482 and NUREG-1433. Revision 1. No physical plant modifications or operational procedure changes are being introduced as a result of this proposed TS Change.

Therefore, the proposed TS changes do not involve a reduction in a margin of safety.

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Information Supporting an Environmental Assessment

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An Environmental Assessment is not required for the changes proposed by this Change Request because the requested changes to the LGS. Units 1 and 2, TS conform to the criteria for "actions eligible for categorical exclusion," as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a significant hazards consideration as discussed in the preceding 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 changes do not involve a significant or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the LGS, Units 1 and 2, TS and have concluded that they do not involve an unreviewed safety question, and will not endanger the health and safety of the public.