PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA, PA. 19101

(215) 841-4000

June 19, 1989 Docket Nos. 50-352 50-353 License No. NPF-39 Construction Permit No. CPPR-107

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

SUBJECT: Limerick Generating Station, Units 1 and 2 Withdrawal of Request for Exemption from 10 CFR 50.44

REFERENCES: 1) Letter, G. A. Hunger, Jr. (PECo) to USNRC dated May 23, 1989

2) Telecon between J. E. Price and C. W. Wiedersum (PECo) and W. R. Butler (USNRC), dated June 14, 1989

Gentlemen:

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As discussed in the June 14, 1989 telephone conversation (Reference 2), Philadelphia Electric Company is hereby withdrawing the request for exemption from 10 CFR 50.44 (c)(3)(ii)(B) submitted in our May 23, 1989 letter (Reference 1). The basis for this withdrawal is that the hydrogen recombiner design effectively satisfies the requirements of 10 CFR 50.44 (c)(3)(ii)(B) by compliance with other design bases to provide for greater recombiner reliability.

The existing design to power the hydrogen recombiner containment isolation valves from the same electrical division of their associated recombiner is acceptable for the following reasons.

 The valves are all normally closed and are not required to be opened to permit recombiner operation until approximately 39 hours after a Loss of Coolant Accident (LOCA) (Reference Final Safety Analysis Report (FSAR) Section 6.2.5.3).

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- 2) The recombiner system contains two 100% redundant subsystems and is designed as a closed system outside containment as described in FSAR Section 6.2.4.3.1.3.2.3.
- 3) A failure of only one electrical power division will isable the recombiner subsystem. If diverse power supplies were provided, a failure in either of the power supplies would disable the recombiner subsystem. System reliability is discussed in FSAR Section 6.2.4.3.1.3.2.3.

We conclude that the existing design effectively satisfies the requirements of 10 CFR 50.44(c)(3)(ii)(B) by compliance with other design bases (i.e., to maximize recombiner reliability and ensure that containment isolation capability criteria are satisfied), and therefore an exemption from 10 CFR 50.44(c)(3)(ii)(B) is not required.

If you have any questions regarding this matter, please contact us.

Very truly yours,

b.a. Hunger, fr

G. A. Hunger, Jr. Director Licensing Section Nuclear Support Division

cc: W. T. Russell, Administrator, Region I, USNRC T. J. Kenny, USNRC Senior Resident Inspector, LGS