



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

May 8, 1989

Docket Nos. 50-352/353

Mr. George A. Hunger, Jr.
Director-Licensing
Philadelphia Electric Company
Correspondence Control Desk
P. O. Box 7520
Philadelphia, Pennsylvania 19101

Dear Mr. Hunger:

SUBJECT: LEAK TESTING OF VALVES (TAC NO. 69575)

RE: LIMERICK GENERATING STATION, UNITS 1 AND 2

This is in response to your letter dated September 23, 1988, wherein you requested an exemption from the requirements of paragraphs II.H.4 and III.C of Appendix J to 10 CFR Part 50 for 54 valves. As discussed below, no exemption is required. Briefly, these paragraphs require leak testing of individual valves in piping systems that penetrate the primary containment. Your exemption request applies only to leak testing the stem packing of valves on lines that terminate below the suppression pool minimum water level.

The staff has completed its review of your request. In particular, we reviewed the piping and instrument diagram (P&ID) and the appropriate valve tables in the Final Safety Analysis Report, Section 6.2, Containment Systems, for every valve to which your requested exemption applies. This review verified that each potential leakage pathway is sealed by water in the suppression pool, because each subject piping system terminates below the pool's minimum postulated accident water level. There are no branch lines that are open to the containment atmosphere, no vacuum breakers on the lines and there is no direct connection between the inside and outside atmospheres of the primary containment. Thus, while the staff notes that there is a need to leak test these valves, the valves are outside the scope of Appendix J to 10 CFR Part 50 and it is therefore not required that you test them in accordance with Appendix J. No exemption is required.

The staff has reviewed your proposed program for leak testing these valves under the aegis of General Design Criterion (GDC) 54 (Appendix A to 10 CFR Part 50). Your proposed leak testing program for these valves meets the intent of GDC 54 and the leak testing requirements of Category A valves under your Inservice Test Program, and is therefore acceptable.

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Mr. Hunger

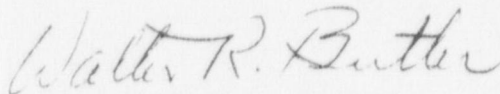
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May 8, 1989

As part of the staff's review of this request, several minor errors were noted in FSAR Chapter 6.2 tables. As discussed by telephone with your staff last week, these errors will be corrected with your next FSAR revision.

If you have any questions on this matter, please do not hesitate to contact me at 301-492-3045.

Sincerely,



Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

cc:
See next page

Mr. George A. Hunger, Jr.
Philadelphia Electric Company

Limerick Generating Station
Units 1 & 2

cc:

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Mr. Hunger

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/s/

Walter R. Butler, Director
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Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

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