



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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 20
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that
 - A. The application for amendment by Philadelphia Electric Company (the licensee) dated August 19, 1986, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 20, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 19, 1989

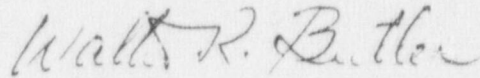
PDI-2/1A
MD Butler
5/19/89

PDI-2/PM
RClark:m
05/11/89

OGC
5/15/89
WButler
5/18/89
WButler
5/18/89

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, reading "Walter R. Butler".

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 19, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 20

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages provided to maintain document completeness.*

Remove

3/4 4-15

3/4 4-16

B 3/4 4-3*

B 3/4 4-4

6-15*

6-16

Insert

3/4 4-15

3/4 4-16

B 3/4 4-3*

B 3/4 4-4

6-15*

6-16

6-16a

REACTOR COOLANT SYSTEM

3/4.4.5 SPECIFIC ACTIVITY

LIMITING CONDITION FOR OPERATION

3.4.5 The specific activity of the primary coolant shall be limited to:

- a. Less than or equal to 0.2 microcurie per gram DOSE EQUIVALENT I-131, and
- b. Less than or equal to 100/E microcuries per gram.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, and 4.

ACTION:

- a. In OPERATIONAL CONDITION 1, 2, or 3 with the specific activity of the primary coolant;
 1. Greater than 0.2 microcurie per gram DOSE EQUIVALENT I-131 but less than or equal to 4 microcuries per gram, DOSE EQUIVALENT I-131 for more than 48 hours during one continuous time interval or greater than 4.0 microcuries per gram DOSE EQUIVALENT I-131, be in at least HOT SHUTDOWN with the main steam line isolation valves closed within 12 hours. The provisions of Specification 3.0.4 are not applicable.
 2. Greater than 100/E microcuries per gram be in at least HOT SHUTDOWN with the main steamline isolation valves closed within 12 hours.
- b. In OPERATIONAL CONDITION 1, 2, 3, or 4, with the specific activity of the primary coolant greater than 0.2 microcuries per gram DOSE EQUIVALENT I-131 or greater than 100/E microcuries per gram, perform the sampling and analysis requirements of Item 4.a of Table 4.4.5-1 until the specific activity of the primary coolant is restored to within its limit.
- c. In OPERATIONAL CONDITION 1 or 2, with:
 1. THERMAL POWER changed by more than 15% of RATED THERMAL POWER in 1 hour, or
 2. The off-gas level, at the SJAE, increased by more than 10,000 microcuries per second in 1 hour during steady-state operation at release rates less than 75,000 microcuries per second, or
 3. The off-gas level, at the SJAE, increased by more than 15% in 1 hour during steady-state operation at release rates greater than 75,000 microcuries per second,perform the sampling and analysis requirements of Item 4.b of Table 4.4.5-1 until the specific activity of the primary coolant is restored to within its limit.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS

4.4.5 The specific activity of the reactor coolant shall be demonstrated to be within the limits by performance of the sampling and analysis program of Table 4.4.5-1.

REACTOR COOLANT SYSTEM

BASES

3/4.4.3 REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.3.1 LEAKAGE DETECTION SYSTEMS

The RCS leakage detection systems required by this specification are provided to monitor and detect leakage from the reactor coolant pressure boundary. These detection systems are consistent with the recommendations of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems," May 1973. In conformance with Regulatory Guide 1.45, the channel calibration tests will verify the ability to detect a 1 gpm leak in less than 1 hour and an atmospheric gaseous radioactivity system sensitivity of 10^{-6} μ C/cc.

3/4.4.3.2 OPERATIONAL LEAKAGE

The allowable leakage rates from the reactor coolant system have been based on the predicted and experimentally observed behavior of cracks in pipes. The normally expected background leakage due to equipment design and the detection capability of the instrumentation for determining system leakage was also considered. The evidence obtained from experiments suggests that for leakage somewhat greater than that specified for UNIDENTIFIED LEAKAGE the probability is small that the imperfection or crack associated with such leakage would grow rapidly. However, in all cases, if the leakage rates exceed the values specified or the leakage is located and known to be PRESSURE BOUNDARY LEAKAGE, the reactor will be shutdown to allow further investigation and corrective action.

The Surveillance Requirements for RCS pressure isolation valves provide added assurance of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. Leakage from the RCS pressure isolation valves is IDENTIFIED LEAKAGE and will be considered as a portion of the allowed limit.

3/4.4.4 CHEMISTRY

The water chemistry limits of the reactor coolant system are established to prevent damage to the reactor materials in contact with the coolant. Chloride limits are specified to prevent stress corrosion cracking of the stainless steel. The effect of chloride is not as great when the oxygen concentration in the coolant is low, thus the 0.2 ppm limit on chlorides is permitted during POWER OPERATION. During shutdown and refueling operations, the temperature necessary for stress corrosion to occur is not present so a 0.5 ppm concentration of chlorides is not considered harmful during these periods.

Conductivity measurements are required on a continuous basis since changes in this parameter are an indication of abnormal conditions. When the conductivity is within limits, the pH, chlorides and other impurities affecting conductivity must also be within their acceptable limits. With the conductivity meter inoperable, additional samples must be analyzed to ensure that the chlorides are not exceeding the limits.

The surveillance requirements provide adequate assurance that concentrations in excess of the limits will be detected in sufficient time to take corrective action.

REACTOR COOLANT SYSTEM

BASES

3/4.4.5 SPECIFIC ACTIVITY

The limitations on the specific activity of the primary coolant ensure that the 2-hour thyroid and whole body doses resulting from a main steam line failure outside the containment during steady state operation will not exceed small fractions of the dose guidelines of 10 CFR Part 100. The values for the limits on specific activity represent interim limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters, such as SITE BOUNDARY location and meteorological conditions, were not considered in this evaluation.

The ACTION statement permitting POWER OPERATION to continue for limited time periods with the primary coolant's specific activity greater than 0.2 microcurie per gram DOSE EQUIVALENT I-131, but less than or equal to 4 microcuries per gram DOSE EQUIVALENT I-131, accommodates possible iodine spiking phenomenon which may occur following changes in THERMAL POWER. Operation with specific activity levels exceeding 0.2 microcurie per gram DOSE EQUIVALENT I-131 but less than or equal to 4 microcuries per gram DOSE EQUIVALENT I-131 must be restricted since these activity levels increase the 2-hour thyroid dose at the SITE BOUNDARY following a postulated steam line rupture.

Closing the main steam line isolation valves prevents the release of activity to the environs should a steam line rupture occur outside containment. The surveillance requirements provide adequate assurance that excessive specific activity levels in the reactor coolant will be detected in sufficient time to take corrective action.

3/4.4.6 PRESSURE/TEMPERATURE LIMITS

All components in the reactor coolant system are designed to withstand the effects of cyclic loads due to system temperature and pressure changes. These cyclic loads are introduced by normal load transients, reactor trips, and startup and shutdown operations. The various categories of load cycles used for design purposes are provided in Section 3.9 of the FSAR. During startup and shutdown, the rates of temperature and pressure changes are limited so that the maximum specified heatup and cooldown rates are consistent with the design assumptions and satisfy the stress limits for cyclic operation.

ADMINISTRATIVE CONTROLS

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Regional Office of the NRC unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

6.9.1.2 The startup report shall address each of the tests identified in Subsection 14.2.12 of the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS*

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions** (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket

*A single submittal may be made for a multiple unit station.

**This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions;

- b. Documentation of all challenges to safety/relief valves; and
- c. Any other unit unique reports required on an annual basis.
- d. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.5. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Cleanup system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORTS

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the the main steam system safety/relief valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC no later than the 15th of each month following the calendar month covered by the report.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT*

6.9.1.7 Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following initial criticality.

The Annual Radiological Environmental Operating Reports shall include summaries, interpretations, and an analysis of trends of the results of the radiological

*A single submittal may be made for a multiple unit station.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS (Continued)

environmental surveillance activities for the report period, including a comparison (as appropriate), with preoperational studies, operational controls and previous environmental surveillance reports and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.12.2.

The Annual Radiological Environmental Operating Reports shall include the results of all radiological environmental samples and of all environmental radiation measurements taken during the report period pursuant to the locations specified in the tables and figures in the OFFSITE DOSE CALCULATION MANUAL, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps**

**One map shall cover stations near the SITE BOUNDARY; a second shall include the more distant stations.