

September 8, 2000

Mr. James A. Hutton
Director-Licensing
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control
P. O. Box 160
Kennett Square, PA 19348

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENTS RE: REVISION TO VENTILATION CHARCOAL ADSORBER
TESTING (TAC NOS. MA7053 AND MA7054)

Dear Mr. Hutton:

The Commission has issued the enclosed Amendment No. 144 to Facility Operating License No. NPF-39 and Amendment No. 106 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated November 5, 1999, as supplemented July 17, 2000.

The amendments make changes to the TS Sections 4.6.5.3.b.2 and 4.6.5.3.c, "Standby Gas Treatment System (SGTS)," 4.6.5.4.b.2 and 4.6.5.4.c, "Reactor Enclosure Recirculation System (RERS)," and 4.7.2.c.2 and 4.7.2.d, "Control Room Emergency Fresh Air System (CREFAS)," to include the requirements for laboratory testing of engineered safety feature ventilation systems charcoal samples per American Society for Testing and Materials D3803-1989 and the application of a safety factor of 2.0 to the charcoal filter efficiency assumed in the plant design-basis dose analyses.

A copy of our related safety evaluation is enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Bartholomew C. Buckley, Sr. Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures: 1. Amendment No. 144 to
License No. NPF-39
2. Amendment No. 106 to
License No. NPF-85
3. Safety Evaluation

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cc w/encls: See next page

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OFFICE	PDI-2/PM	PDI-2/LA	SPLB/BC	OGC	PDI-2/SC
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DATE	9/7/00	9/5/00	8/24/00	8/25/00	9/7/00

OFFICIAL RECORD COPY

Limerick Generating Station, Units 1 & 2

cc:

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PECO ENERGY COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.144
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company (the licensee) dated November 5, 1999, as supplemented July 17, 2000, 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. 144 , are hereby incorporated into this license. PECO Energy 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 and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: September 8, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 144

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 6-53

3/4 6-55

3/4 6-56

3/4 7-7

Insert

3/4 6-53

3/4 6-55

3/4 6-56

3/4 7-7

PECO ENERGY COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 106
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by PECO Energy Company (the licensee) dated November 5, 1999, as supplemented July 17, 2000, 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-85 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. 106 , are hereby incorporated in the license. PECO Energy Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: September 8, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 106

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 6-53

3/4 6-55

3/4 6-56

3/4 7-7

Insert

3/4 6-53

3/4 6-55

3/4 6-56

3/4 7-7

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 144 AND 106 TO FACILITY OPERATING
LICENSE NOS. NPF-39 AND NPF-85
PECO ENERGY COMPANY
LIMERICK GENERATING STATION, UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated November 5, 1999, as supplemented July 17, 2000, the PECO Energy Company (the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TSs). The November 5, 1999, letter requested changes to the Technical Specifications (TSs) Sections 4.6.5.3.b.2 and 4.6.5.3.c, "Standby Gas Treatment System (SGTS)," 4.6.5.4.b.2 and 4.6.5.3.c, "Reactor Enclosure Recirculation System (RERS)," and 4.7.2.c.2 and 4.7.2.d, "Control Room Emergency Fresh Air System (CREFAS)," for Limerick Generating Station, Units 1 and 2 (Limerick Units 1 and 2) to include the requirement for laboratory testing of the SGTS, RERS, and CREFAS charcoal samples per American Society of Testing and Materials (ASTM) D3803-1989 and the application of a safety factor of 2.0 to the charcoal filter efficiency assumed in the plant design-basis dose analysis. The July 17, 2000, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

The U.S. Nuclear Regulatory Commission (NRC) staff, with technical assistance from Brookhaven National Laboratory (BNL), has reviewed the licensee's submittals. In addition, the staff has reviewed the attached BNL Technical Evaluation Report (TER) regarding the proposed TS changes for Limerick Units 1 and 2. Based on its review, the staff adopts the TER. In view of the above, and because the NRC staff considers ASTM D3803-1989 to be the most accurate and most realistic protocol for testing charcoal in safety-related ventilation systems, the NRC staff finds that the proposed TS changes are acceptable.

The NRC received a letter from ASTM in response to a March 8, 2000, *Federal Register* Notice (65 FR 12286) related to revising testing standards in accordance with ASTM D3803-1989 for laboratory testing of activated charcoal in response to GL 99-02. ASTM notified the NRC that the 1989 standard is out of date and should be replaced by D3803-1991 (1998). The staff acknowledges that the current version of ASTM D3803 is ASTM D3803-1991 (reaffirmed in 1998). However, it was decided, for consistency purposes, to have all of the nuclear reactors

test to the same standard (ASTM D3803-1989) because, prior to GL 99-02 being issued, approximately one third of the nuclear reactors had TSs that referenced ASTM D3803-1989 and there are no substantive changes between the 1989 and 1998 versions.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 4287). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: B. Buckley

Date: September 8, 2000