

10 CFR 50.90



PECO ENERGY

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

April 27, 1994

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. 94-14-0

Gentlemen:

PECO Energy Company is submitting Technical Specifications (TS) Change Request No. 94-14-0 in accordance with 10 CFR 50.90, requesting an amendment to the TS (i.e., Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station, Units 1 and 2, respectively. This proposed TS change will delete TS Surveillance Requirement (SR) 4.4.1.1.1, which requires that the reactor recirculation pump discharge valve be demonstrated operable by performing a full-stroke test of the valve prior to reactor thermal power exceeding 25% of rated reactor thermal power. Information supporting this TS Change Request is contained in Attachment 1 to this letter, and the proposed replacement pages for the LGS, Units 1 and 2, TS are contained in Attachment 2. This information 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 effective immediately upon issuance.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

M. C. Kray for

G. A. Hunger, Jr.
Director
Licensing Section

Attachments
Enclosure

cc: T. T. Martin, 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 Radiation Protection, (w/ attachments, enclosure)

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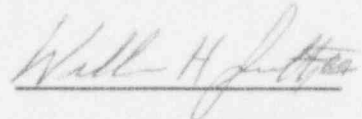
COMMONWEALTH OF PENNSYLVANIA

ss.

COUNTY OF CHESTER

W. H. Smith, III, 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 Technical Specifications Change Request No. 94-14-0 for Limerick Generating Station, Units 1 and 2, to delete the requirement to perform full-stroke testing of the reactor recirculation pump discharge valve prior to reactor power exceeding 25% of rated reactor thermal power, 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.

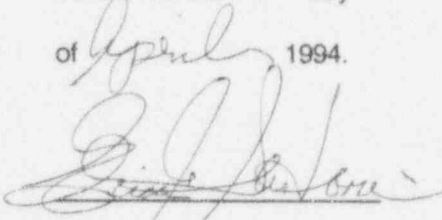


Vice President

Subscribed and sworn to

before me this 27th day

of April 1994.



Notary Public

Notarial Seal
Erica A. Santon, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

ATTACHMENT 1

LIMERICK GENERATING STATION

UNITS 1 AND 2

Docket Nos.	50-352 50-353
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License Nos.	NPF-39 NPF-85
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TECHNICAL SPECIFICATIONS CHANGE REQUEST

No. 94-14-0

**"Delete Technical Specifications Surveillance Requirement 4.4.1.1.1
Requiring that the Reactor Recirculation Pump Discharge
Valve be Full-Stroke Tested Prior to Reactor Power Exceeding 25%
of Rated Reactor Thermal Power"**

Supporting Information for Changes - 4 pages

PECO Energy Company, Licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station, 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 delete TS Surveillance Requirement (SR) 4.4.1.1.1, which requires that the reactor recirculation pump discharge valve be demonstrated operable by full-stroke testing the valve prior to reactor power exceeding 25% of rated reactor thermal power. The proposed changes to the TS are indicated by a vertical bar in the margin of TS page 3/4 4-2 for Units 1 and 2. The TS pages showing the proposed changes are contained in Attachment 2.

We request that, if approved, the TS change proposed herein be effective immediately upon issuance of the amendments.

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

Discussion and Description of the Proposed Changes

Currently, Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) Surveillance Requirement (SR) 4.4.1.1.1 requires each reactor recirculation system pump discharge valve be demonstrated operable by cycling each valve through at least one (1) complete cycle of full travel during each startup prior to reactor thermal power exceeding 25% of the rated reactor thermal power, unless the cycling has been performed within the previous 31 days. The proposed TS change involves deleting TS SR 4.4.1.1.1 and the associated footnote. The proposed TS change will not impact the ability of the reactor recirculation system from providing sufficient flow through the reactor core to remove heat from the fuel. The purpose of this TS SR is to satisfy an Emergency Core Cooling System (ECCS) operability requirement for Boiling Water Reactors (BWRs) where the reactor recirculation system piping serves as the injection flowpath to the reactor pressure vessel for the Low Pressure Coolant Injection (LPCI) system, an ECCS. However, at LGS, the LPCI system does not rely on the reactor recirculation system piping for a flowpath for injecting into the reactor pressure vessel. Each LPCI subsystem has a designated nozzle on the reactor vessel to facilitate LPCI system injection directly into the reactor pressure vessel. The reactor recirculation system pump discharge valves do not have an active safety-related function and are classified as passive safety-related components.

Safety Assessment

The reactor recirculation system consists of two (2) recirculation pump loops external to the reactor pressure vessel. These loops provide the piping for the driving flow of water to the reactor pressure vessel jet pumps. Each of the two (2) external recirculation loops discharge high pressure flow into an external manifold from which the individual recirculation inlet lines are routed to the jet pumps within the reactor pressure vessel. Each external reactor recirculation loop contains one (1) high capacity, variable-speed, motor-driven recirculation pump and two (2) motor-operated gate valves (i.e., pump suction and discharge valves) which are used for maintaining the reactor pressure boundary integrity to facilitate reactor recirculation pump maintenance activities. Pump casing and valve bodies are designed for a 40-year life and are welded into the reactor recirculation piping system with no plans to remove them from the piping system for maintenance or overhaul. The reactor recirculation system piping is of all-

welded construction and is designed and constructed to meet the applicable requirements of the American Society of Mechanical Engineers (ASME) Code. The reactor recirculation system pressure boundary equipment is designed to satisfy seismic Category I criteria. The reactor recirculation system piping, valves, and pumps are supported by hangers to avoid the use of piping expansion loops that would be required if the pumps were anchored.

Currently, Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) Surveillance Requirement (SR) 4.4.1.1.1 requires each reactor recirculation system pump discharge valve be demonstrated operable by cycling each valve through at least one (1) complete cycle of full travel during each startup prior to reactor thermal power exceeding 25% of the rated reactor thermal power, unless the cycling has been performed within the previous 31 days. The purpose of this TS SR requirement is to satisfy an Emergency Core Cooling System (ECCS) operability requirement for Boiling Water Reactors (BWRs) where the reactor recirculation system piping provides an injection flowpath to the reactor pressure vessel for the Low Pressure Coolant Injection (LPCI) system, an ECCS. However, at LGS, the reactor recirculation system does not support the operation of the LPCI system. The LPCI subsystems have dedicated injection nozzles on the reactor vessel which provide an independent injection flowpath to the reactor pressure vessel. The reactor recirculation system pump discharge valves are normally open during reactor power operation and have no active safety-related function. These valves are classified as passive safety-related components designed to maintain reactor pressure boundary integrity to facilitate reactor recirculation pump maintenance activities.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed change to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS) to delete TS Surveillance Requirement (SR) 4.4.1.1.1 which requires that the reactor recirculation pump discharge valve be demonstrated operable by full-stroke testing the valve prior to reactor power exceeding 25% of rated reactor thermal power does 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) change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change to delete the TS Surveillance Requirement (SR) does not require any modifications to the plant or equipment, and will not impact the operation of the reactor recirculation system. The reactor recirculation system will continue to function as designed to maintain reactor pressure boundary integrity and to provide sufficient flow through the reactor core to remove heat from the fuel. This proposed TS change does not affect the operation of any Emergency Core Cooling System (ECCS) or other plant equipment important to safety. The purpose of this TS SR is to satisfy an ECCS operability requirement for Boiling Water Reactor (BWRs) where the reactor recirculation system piping serves as the injection flowpath to the reactor pressure vessel for the Low Pressure Coolant Injection (LPCI) system, an ECCS. Each LPCI subsystem, at LGS, has an independent flowpath which does not rely on the reactor recirculation system piping for injecting to the reactor pressure vessel. The reactor recirculation system pump discharge valves do not perform an active safety-related function and are classified as passive safety-related components

designed to maintain the reactor pressure boundary integrity during reactor recirculation pump maintenance activities. These valves are not normally used during plant operations except to establish normal shutdown cooling, a manually initiated non-safety related function. These valves are not used to mitigate the consequences of design bases accidents.

Therefore, the proposed change does not involve an increase in the probability or consequences of an accident previously evaluated.

2. The proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This proposed TS does not require physical changes to the plant or equipment, and does not impact any design or functional requirements of the reactor recirculation system, LPCI system, or other plant systems important to safety. The purpose for this TS SR is to satisfy an ECCS operability requirement for BWRs where the reactor recirculation system piping serves as the injection flowpath to the reactor pressure vessel for the LPCI system. The LPCI system at LGS has an independent flowpath for injecting to reactor pressure vessel and does not rely on the reactor recirculation system piping as part of the injection flowpath. Since the intent of this requirement is to support LPCI operation, and the LPCI system design function is accident mitigation, eliminating this TS SR has no impact on the types of accidents that could occur. The reactor recirculation system pump discharge valves do not perform an active safety-related function and are classified as passive safety-related components designed to maintain the reactor pressure boundary integrity during reactor recirculation pump maintenance activities.

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

3. The proposed TS change does not involve a significant reduction in a margin of safety.

The proposed change to delete the TS SR does not involve a change to the physical design or functional requirements of the reactor recirculation system, LPCI system, or other plant system important to safety. The reactor recirculation system will continue to function as designed to maintain reactor pressure boundary integrity and to provide sufficient flow through the reactor core to remove heat from the fuel. This proposed TS change does not impact the safety-related operation of the LPCI system. The LPCI system will continue to function as designed to mitigate the consequences of an accident. These valves do not perform an active safety-related function and are classified as passive safety-related components designed to maintain the reactor pressure boundary integrity during reactor recirculation pump maintenance activities.

Therefore, the proposed TS change does not involve a reduction in a margin of safety.

Information Supporting an Environmental Assessment

An Environmental Assessment is not required for the change proposed by this Change Request because the requested change 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 change will have no impact on the environment. The proposed change does not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed change does not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed change does not involve a significant increase in individual or cumulative occupational radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed this proposed change 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.