

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

April 26, 1990

Docket Nos. 50-352
50-353License Nos. NPF-39
NPF-85U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555SUBJECT: Limerick Generating Station, Units 1 and 2
Technical Specifications Change Request

Dear Sir:

Philadelphia Electric Company hereby submits Technical Specifications Change Request No. 89-16, in accordance with 10 CFR 50.90, requesting an amendment to the Technical Specifications (TS) (Appendix A) of Operating License Nos. NPF-39 and NPF-85. Information supporting this Change Request is contained in Attachment 1 to this letter. Attachment 2 provides a list of references used to justify this Change Request, and Attachment 3 provides the proposed TS replacement pages.

This submittal requests changes to the TS to extend surveillance test intervals and allowable out-of-service times for instrumentation supporting the Reactor Protection System (RPS), and Emergency Core Cooling System (ECCS), including common instrumentation.

This letter also submits the following documents which provide additional information supporting this Change Request, as enclosures.

- a) Enclosure 1 - General Electric (GE) Document No. OG9-1219-32D, letter W. P. Sullivan, GE, to Boiling Water Reactor Owners' Group (BWROG) Technical Specification Committee, dated December 22, 1989: "Clarification of Limerick 1 and 2 Proposed Technical Specification Changes Common to Reactor Protection System or ECCS Actuation Instrumentation."
- b) Enclosure 2 - GE Document No. OG9-749-32D, letter from W. P. Sullivan, GE, to BWROG Technical Specification Committee dated August 7, 1989: "Clarification of Technical Specification Changes Given in ECCS Actuation Instrumentation Analysis."
- c) Enclosure 3 - GE Document No. MDE-93-0485-1, "Technical Specification Improvement Analysis for the Reactor Protection System for Limerick Generating Station Units 1 and 2," dated October 1987.

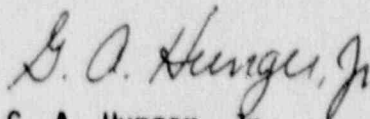
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- d) Enclosure 4 - GE Document No. RE-019, "Technical Specification Improvement Analysis for Emergency Core Cooling System Actuation Instrumentation for Limerick Generating Station Units 1 and 2," dated December 1986.
- e) Enclosure 5 - GE Document No. OG90-319-320, letter from W. P. Sullivan, GE, to U.S. NRC, dated March 22, 1990: "Clarification of Technical Specification Changes Given in ECCS Actuation Instrumentation Analysis."
- f) Enclosure 6 - Limerick Generating Station, Unit 1 Instrument Drift Data for RPS, and ECCS, including Common Instrumentation.

Please note that applications, and accompanying affidavits in accordance with 10 CFR 2.790(b)(1), to withhold from public disclosure GE Document Nos. MDE-93-0485-1, "Technical Specification Improvement Analysis for the Reactor Protection System for Limerick Generating Station Units 1 and 2," dated October 1987, and RE-019, "Technical Specification Improvement Analysis for Emergency Core Cooling System Actuation Instrumentation for Limerick Generating Station Units 1 and 2," dated December 1986 are included with Enclosures 3 and 4, respectively. Accordingly, we request that the documents identified above (Enclosures 3 and 4) be withheld from public disclosure in accordance with 10 CFR 2.790(a)(4).

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

Sincerely yours,



G. A. Hunger, Jr.
Manager
Licensing Section
Nuclear Engineering and Services Department

Attachments

Enclosures

cc: T. T. Martin, Administrator, Region I, USNRC
T. J. Kenny, USNRC Senior Resident Inspector, LGS
T. M. Gerusky, Director, PA Bureau of Radiological Protection

COMMONWEALTH OF PENNSYLVANIA

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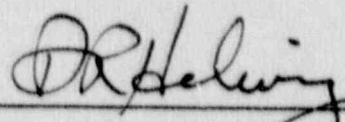
SS.

COUNTY OF CHESTER

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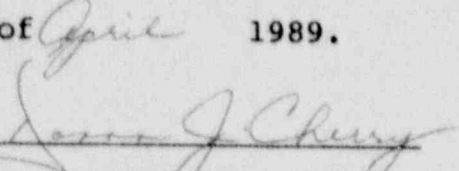
D. R. Helwig, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating Licenses, to extend surveillance test intervals and allowable out-of-service times for instrumentation supporting the Reactor Protection System, and Emergency Core Cooling System, including common instrumentation, 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 26th day
of April 1989.



Notary Public

