

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

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April 19, 1993

Docket Nos. 50-352
50-353License Nos. NPF-39
NPF-85

STATION SUPPORT DEPARTMENT

U. 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. 92-10-0, in accordance with 10CFR50.90, 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 allowed outage times for the containment isolation actuation instrumentation as analyzed in Reference 1 and approved by the NRC in Reference 2. The requested changes are consistent with those analyzed and approved in these references.

This letter also submits Enclosure 1, "Limerick Generating Station, Unit 2 Instrument Drift Data for Containment Isolation Actuation Instrumentation," as additional supporting information.

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

Very truly yours,


G. A. Hunger, Director
Licensing Section

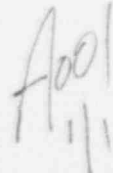
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Attachments

Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC w/attachments and enclosure
N. S. Perry, USNRC Senior Resident Inspector, LGS w/attachments and enclosure

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COMMONWEALTH OF PENNSYLVANIA

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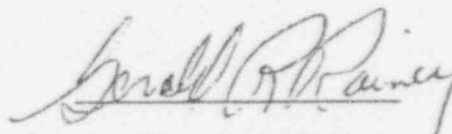
COUNTY OF CHESTER

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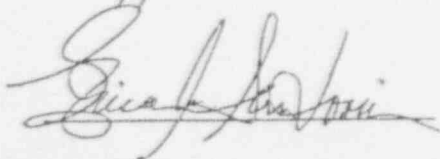
G. R. Rainey, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company, the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating License Nos. NPF-39 and NPF-85 (Technical Specifications Change Request No. 92-10-0) to reduce the testing frequency of the isolation actuation 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 16th day
of April 1993.



Notarial Seal
Eric 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

License Nos. NPF-39

NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

"Reduced Testing of Isolation Actuation Instrumentation"

Supporting Information for Changes - 5 pages

Philadelphia Electric Company (PECo), Licensee under Facility Operating Licenses NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively, requests that the Technical Specifications (TS) contained in Appendix A of the Operating Licenses be amended as proposed herein to extend surveillance test intervals (STIs) and allowed outage times (AOTs) for the containment isolation actuation instrumentation (IAI). The proposed changes will minimize unnecessary testing and remove excessively restrictive AOTs that could potentially degrade overall plant safety and availability.

We request the changes proposed herein to be effective fifteen (15) days after issuance of the Amendment.

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

Discussion and Description of Proposed Changes

Licensing Topical Report (LTR), "BWR Owners' Group Response to NRC Generic Letter 83-28, Item 4.5.3," (Reference 4) provided justification for the acceptability of then current Reactor Protection System (RPS) instrumentation STIs. In addition, Reference 4 established a basis for extending STIs and AOTs for RPS instrumentation based on reliability analyses which estimate RPS instrumentation failure frequency. The analyses were further developed in Reference 1 for extending TS STIs and AOTs for the containment IAI, and the analyses were subsequently approved as detailed in an NRC Safety Evaluation Report (SER) (Reference 2). This SER describes the acceptability of both the analyses and the proposed TS changes that were provided to the NRC in Reference 1. In addition, Reference 2 provided criteria for plant specific implementation of the generically approved TS changes. Our compliance with these criteria is discussed in the Safety Assessment of this Change Request.

This Change Request proposes TS changes to the IAI which are specified in the TS mark-ups of Reference 2. All proposed changes are consistent with those approved by the NRC and documented in Reference 2. Therefore these changes are not detailed here. In addition, administrative changes are required to implement the proposed AOT and STI changes. These changes are discussed below.

1. Administrative changes to TS Index pages are proposed. We propose changes to Index pages "xviii" and "xix" to properly reflect the location of information in the TS. These changes are to correct inconsistencies and to reflect additions to the TS Bases which reference the appropriate LTR(s) and accompanying SER(s). Each of the TS Instrumentation Bases page changes are proposed to correct inconsistencies, make an addition, as just described, or to accommodate carry over from a previous page as a result of the addition.

2. Revisions to the note referenced on TS pages 3/4 3-9, 3/4 3-16 and the associated notes in TS Table 4.3.2.1-1 are proposed which correspond to the STI and AOT changes proposed herein. The note is being revised to eliminate the previous references to instrumentation which was common to the Emergency Core Cooling Systems (ECCS) or the containment IAI, but which are no longer necessary.

Safety Assessment

The effect on safety of the proposed extensions to the STIs and AOTs of the IAI have been addressed in Reference 1. Further, the NRC has detailed their acceptance of the analyses and the conclusions of Reference 1 in an SER (Reference 2). The SER concludes that implementation of the TS changes proposed in Reference 1 would provide an overall enhancement to plant safety and that the proposed changes are acceptable subject to the licensee documenting (1) plant specific applicability, and (2) that instrument drift is bounded by the assumptions of the generic analyses. These acceptance conditions are addressed below.

1. A plant-specific review of the applicability of the Reference 1 LTR to LGS has been conducted. For the IAI, the review compared the LGS IAI configurations with those in the Reference 1 analyses. This comparison concluded that the configurations are consistent with those in the Reference 1 analyses and thus is applicable to LGS.
2. In 1988, the NRC issued additional guidance regarding instrument drift (Reference 3). This letter states that "licensees need only confirm that the setpoint drift which could be expected under the extended STIs has been studied and either (1) has been shown to remain within the existing allowance in the RPS (for BWRs) ... instrument setpoint calculation or (2) that the allowance and setpoint have been adjusted to account for the additional expected drift." Present setpoint calculations for LGS are based on an eighteen (18) month calibration interval. Therefore instrument drift occurring during a three month STI falls within the existing drift allowance. To further verify this, instrument drift data was examined over three consecutive monthly test intervals. Enclosure 1, "Limerick Generating Station, Unit 2, Instrument Drift Data for Containment Isolation Actuation Instrumentation," provides the as-found drift data on a ten percent (10%) sample of LGS Unit 2 IAI. This data provides actual verification that the drift occurring over three consecutive test intervals (i.e., one calendar quarter) is within acceptable limits. Note that the basis for this proposed change is not affected by our pending request to increase the STIs for certain instruments from a nominal 18 month frequency to a nominal 24 month frequency, submitted to the NRC by letter dated October 15, 1992 as TS Change Request 92-03-0.

2. Revisions to the note referenced on TS pages 3/4 3-9, 3/4 3-16 and the associated notes in TS Table 4.3.2.1-1 are proposed which correspond to the STI and AOT changes proposed herein. The note is being revised to eliminate the previous references to instrumentation which was common to the Emergency Core Cooling Systems (ECCS) or the containment IAI, but which are no longer necessary.

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As discussed above, we have conformed to the guidance provided in Reference 2 in the two areas to be addressed by licensees to ensure the acceptability of proposed TS changes. As noted previously, administrative changes which are not addressed in the NRC SERs are necessary to correct inconsistencies and to facilitate implementation of the proposed TS changes. The following discussion addresses the acceptability of these additional proposed changes.

The proposed administrative changes to TS Index pages "xviii" and "xix" are necessary to accurately reflect the location of various Sections in the TS. These changes have no impact on safety.

Modifications to the notes referenced on TS pages 3/4 3-9, 3/4 3-16, and in TS Table 4.3.2.1-1 are administrative as well. The notes are being revised to eliminate references which will no longer be necessary upon approval of the proposed changes. Modification of these notes does not affect any requirements of the TS, and thus has no impact on safety.

Reference 2 provided TS changes based on review of the LTR (Reference 1). We have proposed TS changes consistent with those previously approved and specifically designated in Reference 2 and those administrative changes necessary to properly implement the proposed changes.

In summary, the NRC criteria for demonstrating the applicability and acceptability of all proposed changes has been shown to be met, as detailed above. We therefore conclude that the changes proposed will minimize unnecessary testing and relax excessively restrictive AOTs, and will provide an overall enhancement to plant safety.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the LGS TS, which extend STIs and AOTs for the IAI, do not constitute a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three standards set forth in 10CFR50.92 is provided below.

- 1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS changes increase the STIs and AOTs for the IAI. In addition, several administrative changes are necessary. These include revision of two Index pages to correct inconsistencies and to reflect the addition of LTR and SER references in the TS Bases, which caused the location of several Bases sections to change, and an administrative modification of TS page 3/4 3-9, 3/4 3-16, and the associated TS Table 4.3.2.1-1 notes.

There are no changes in any of the affected systems themselves. Since there are no such changes, there can be no change in the probability of occurrence of an accident or the consequences of an accident or the

consequences of malfunction of equipment. Regarding the probability of malfunction of equipment, Reference 1 showed that there is a small increase in the unavailability of the total containment isolation function frequency. This increase in containment isolation failure frequency is less than the established acceptance criterion. The NRC, in its review of Reference 1, concurred with this conclusion. The changes proposed are consistent with those approved by the NRC in Reference 2. Therefore the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS changes do not create the possibility for an accident or malfunction of a different type than any evaluated previously in the Updated Final Safety Analysis Report (UFSAR). The proposed changes increase the STIs and AOTs for the IAI, revise Index pages to reflect the addition of references in the TS Bases, and modify table notes to be consistent with the proposed changes. There are no changes to any systems. Since there are no such changes, there is no possibility for an accident or malfunction of a different type than any evaluated previously.

3. The proposed changes do not involve a significant reduction in a margin of safety.

The proposed TS changes do not reduce the margin of safety as defined in the basis for any TS. The proposed TS changes do not change any setpoints of the IAI or its level of redundancy. IAI setpoints are based upon the drift occurring during the 18 month calibration interval. The proposed changes extend STIs and AOTs, and are discussed in Reference 1 are bounded by the Analyses in Reference 1 are bounded by the Analyses in Reference 1. These analyses, which were reviewed and approved by the NRC, examined the effects of extending STIs and AOTs, and found that the proposed changes do not involve a reduction in a margin of safety. The administrative changes proposed cannot affect safety and therefore do not involve a reduction in a margin of safety.

Information Supporting an Environment Assessment

An environmental assessment is not required for the changes proposed by this Change Request because the requested changes conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The requested changes will have no impact on the environment. The proposed changes do not involve a significant hazards consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluent that may be released offsite. In addition, the proposed changes do not involve a significant increase

in individual or cumulative occupation radiation exposure.

Conclusion

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the TS and determined that they do not involve an Unreviewed Safety Question and will not endanger the health and safety of the public.

REFERENCES

1. W. P. Sullivan, et al., "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," NEDC-31677P-A, July 1990.
2. Safety Evaluation by the office of Nuclear Reactor Regulation, "Review of the BWR Owners Group Report NEDC-31667P on Justification for Extension of Surveillance Test Intervals and Allowed Outage Times for BWR Isolation Instrumentation Not Common to RPS or ECCS Instrumentation," June 18, 1990.
3. C. E. Rossi, NRC, to R. F. Janacek, BWROG, "Staff Guidance for Licensee Determination that the Drift Characteristics for Instrumentation Used in RPS Channels are Bounded by NEDC-30851P Assumptions when the Functional Test Interval is Extended from Monthly to Quarterly," April 27, 1988.
4. S. Wisweswaran, et al., "BWR Owners' Group Response to NRC Generic Letter 83-28, Item 4.5.3," General Electric Company, NEDC-30844, January 1985.