



## PHILADELPHIA ELECTRIC COMPANY

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May 21, 1982

Mr. Harold R. Denton  
Director  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 & 2  
Preservice Inspection  
Docket Nos. 50-352/50-353

Dear Mr. Denton:

The ASME Boiler and Pressure Vessel Code, Section XI preservice inspection for Limerick is being performed in three distinct segments as follows: (1) Class 1, 2 and 3 piping systems; (2) reactor pressure vessels, including internals, out to and including the safe end to pipe welds; and (3) pump and valve tests as described in Section XI, Subsections IWP and IWV.

FSAR Sections 5.2.4 and 6.6 state that the preservice inspection will be performed in accordance with the requirements of the 1974 Code, Section XI, through the Summer 1975 Addenda with Appendix III of the Winter 1975 Addenda and paragraph IWA-2232 of the Summer 1976 Addenda, to the extent practicable.

Inspection of piping systems is currently in progress under the code edition described in FSAR.

We are about to begin the inspection of the reactor pressure vessels. In order for inspection to be as current as possible, we are specifying that it be performed in accordance with the 1980 edition of Section XI with addenda up to and including the Winter 1980 Addenda. This Addenda has been accepted by the NRC as noted in the Federal Register, Volume 46, No. 251, dated December 31, 1981, Section 50.55a Codes and Standards.

Since we have not yet started our preservice pump and valve testing, it is our intent to utilize the 1980 edition of Section XI with addenda up to and including the Winter 1980 Addenda for this testing also.

We will include these changes in an FSAR revision to be submitted in June 1982.

Sincerely,

*John S. Kemper*

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