



PECO ENERGY

PECO Energy Company
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Wayne, PA 19087-5691

10CFR50.90

January 10, 1994

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

Gentlemen:

PECO Energy Company (PECO) is submitting Technical Specifications (TS) Change Request No. 93-16-0, in accordance with 10CFR50.90, requesting a change to the TS (i.e., Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2.

This TS Change Request involves the relocation of the seismic monitoring instrumentation Limiting Condition for Operation, Surveillance Requirements, and associated tables and Bases contained in TS sections 3.3.7.2 and 4.3.7.2 to the Updated Final Safety Analysis Report (UFSAR). The NRC issued a policy statement, "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," in the Federal Register (i.e., 58 FR 39132), dated July 22, 1993, which provides a specific set of four (4) objective criteria to determine which regulatory requirements and operating restrictions should be included in TS. This policy statement is the basis for this proposed TS change.

If this TS Change Request is approved, PECO plans to upgrade the existing seismic monitoring instrumentation system. The upgrade will replace and omit some of the existing components utilizing a newer technology; however, the system will function as originally designed. F. Rinaldi and C. W. Moon of the NRC were contacted by R. M. Krich and K. F. Borton, PECO Licensing, on September 14, 1993 to discuss this TS Change Request and PECO's plan to upgrade the seismic monitoring instrumentation system. As a result of the September 14, 1993 phone conversation between PECO and the NRC, this TS Change Request does not detail the system upgrade since it will not occur until after NRC approval of this TS Change Request; however, the marked-up UFSAR pages which show the proposed relocated TS requirements and the planned upgrade are attached for information purposes.

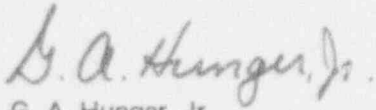
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Information supporting this TS Change Request is contained in Attachment 1 to this letter, and the proposed replacement pages for the LGS, Unit 1 and Unit 2 TS are contained in Attachment 2. In addition, for information purposes, Attachment 3 contains the marked-up UFSAR pages which show the proposed relocated TS requirements and the planned upgrade which will occur after this TS Change Request is approved.

We request that, if approved, this TS Change Request for LGS, Units 1 and 2, be effective by June 6, 1994.

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

Very truly yours,



G. A. Hunger, Jr.,
Director
Licensing Section

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC (w/ attachments)
N. S. Perry, USNRC Senior Resident Inspector, LGS (w/ attachments)
W. P. Dornsife, Director, PA Bureau of Radiological Protection
(w/ attachments)

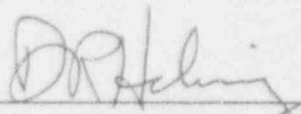
COMMONWEALTH OF PENNSYLVANIA :

: ss.


COUNTY OF CHESTER :

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 enclosed Technical Specifications Change Request No. 93-16-0 "Relocate Seismic Monitoring Instrumentation Requirements From Limerick Generation Station (LGS) Technical Specifications to the LGS Updated Final Safety Analysis Report," for Limerick Generating Station, Unit 1 and Unit 2, Facility Operating License Nos. NPF-39 and NPF-85, 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 20th day
of December 1993.


Notary Public

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

ATTACHMENT 1

LIMERICK GENERATING STATION

UNITS 1 AND 2

DOCKET NOS. 50-352
50-353

LICENSE NOS. NPF-39
NPF-85

TECHNICAL SPECIFICATION CHANGE REQUEST

NO. 93-16-0

"Relocate Seismic Monitoring Instrumentation
Requirements From Limerick Generating Station
(LGS) Technical Specifications to the LGS
Updated Final Safety Analysis Report."

Supporting Information for Changes - 5 PAGES

PECO Energy Company (PECO), licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, requests that the Technical Specifications (TS) contained in Appendix A to the Operating Licenses be amended as proposed herein, to relocate the seismic monitoring instrumentation Limiting Condition for Operation (LCO), Surveillance Requirements (SRs), and associated tables and Bases contained in TS sections 3.3.7.2 and 4.3.7.2 to the Updated Final Safety Analysis Report (UFSAR) section 3.7.4.

The proposed changes to the TS pages are indicated by a vertical bar in the margin of the affected TS pages. The TS pages showing the proposed changes are contained in Attachment 2.

We request that, if approved, the amendment to the LGS, Unit 1 and Unit 2 TS be effective by June 6, 1994.

This submittal 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 the Proposed Changes

These proposed Limerick Generating Station (LGS), Unit 1 and Unit 2, Technical Specifications (TS) changes involve the relocation of the seismic monitoring instrumentation Limiting Condition for Operation (LCO), Surveillance Requirements (SRs), and associated tables and Bases contained in TS sections 3.3.7.2 and 4.3.7.2 to the Updated Final Safety Analysis Report (UFSAR) section 3.7.4.

The NRC issued a policy statement, "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," in the Federal Register (i.e., 58 FR 39132), dated July 22, 1993, which provided a specific set of four (4) objective criteria to determine which regulatory requirements and operating restrictions should be included in TS. This policy statement is the basis for these proposed TS changes. This policy statement explicitly identifies the seismic monitoring instrumentation as an example of controls that are not required to be retained in TS.

In addition, if this TS Change Request is approved, PECO plans to upgrade the existing seismic monitoring instrumentation system. To eliminate any confusion between the proposed TS changes and the upgrade, PECO contacted the NRC. As a result of a phone conversation between PECO and the NRC on September 14, 1993, Attachment 3 of this TS Change Request contains the proposed marked-up UFSAR pages which reflect the proposed TS changes and the planned upgrade; however, the following Safety Assessment does not detail the planned upgrade since the upgrade will not occur until after approval of this TS Change Request and a TS Change Request to perform the upgrade would not be required. The upgrade to the system is necessary because the existing system is difficult to maintain and replacement parts for some components are no longer available. The upgrade will replace some components of the system utilizing a newer technology, and the system will function as originally designed. Since the upgrade will utilize a newer technology, three (3) triaxial peak recording accelerographs, a seismic switch and a seismic trigger will no longer be required in order for the system to function as originally designed. Accordingly, these components do not appear in Attachment 3.

Safety Assessment

These proposed Limerick Generating Station (LGS), Unit 1 and Unit 2, Technical Specifications (TS) changes involve the relocation of the seismic monitoring instrumentation Limiting Condition for Operation (LCO), Surveillance Requirements (SRs), and associated tables and Bases contained in TS sections 3.3.7.2 and 4.3.7.2 to the Updated Final Safety Analysis Report (UFSAR) section 3.7.4.

The seismic monitoring instrumentation is installed on Unit 1 and common components and structures and serves as common instrumentation for both Unit 1 and Unit 2. The system is required by 10CFR100, Appendix A and the purpose of the seismic monitoring instrumentation system is to promptly determine the magnitude of a seismic event and evaluate the response of certain plant components and structures. This capability is needed to permit comparison of the measured plant response to a seismic event to that used in the design basis for Unit 1 and Unit 2.

The NRC issued a policy statement, "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," in the Federal Register (i.e., 58 FR 39132), dated July 22, 1993, which provided a specific set of four (4) objective criteria to determine which regulatory requirements and operating restrictions should be included in TS. This policy statement is the basis for these proposed TS changes. This policy statement explicitly identifies the seismic monitoring instrumentation as an example of controls that are not required to be retained in TS.

The seismic monitoring instrumentation system and associated LGS Unit 1 and Unit 2 TS requirements are evaluated against four NRC criteria contained in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" dated July 22, 1993. The evaluation is detailed in the following section which contains information supporting a finding of No Significant Hazards Consideration, and concludes that the current TS requirements do not meet any of the criteria for regulatory requirements and operating restrictions that should be included in TS. Accordingly, since the NRC policy statement establishes that any TS requirements which do not meet any of the four criteria may be proposed for relocation from the plant TS to licensee-controlled documents such as the UFSAR, these proposed TS changes involve relocating the TS LCO, SRs and associated tables and Bases for the seismic monitoring instrumentation to the UFSAR.

The seismic monitoring instrumentation LCO, SRs, and associated tables and Bases proposed for relocation from TS to the LGS UFSAR will continue to be implemented by administrative controls that will satisfy the applicable requirements of TS section 6 "Administrative Controls." Those requirements include a review of changes to plant systems and equipment and to the applicable administrative controls in accordance with the provisions of 10CFR50.59.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS), to relocate the seismic monitoring instrumentation Limiting Condition for Operation (LCO), Surveillance Requirements (SRs), and associated tables and Bases contained in TS to the Updated Final Safety Analysis Report (UFSAR), do 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) changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The function of the seismic monitoring instrumentation system is to monitor the magnitude and effect of a seismic event only, and can not initiate or mitigate an accident previously evaluated. Furthermore, the proposed TS changes to relocate the seismic monitoring instrumentation requirements from TS to the UFSAR are in accordance with the criteria for determining those requirements that should remain in the TS as defined by the NRC in its final policy statement, "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," dated July 22, 1993. The seismic monitoring instrumentation LCO, SRs, and associated tables and Bases proposed for relocation from TS to the LGS UFSAR will continue to be

implemented by administrative controls that will satisfy the applicable requirements of TS section 6 "Administrative Controls." Those requirements include a review of changes to plant systems and equipment and to the applicable administrative controls in accordance with the provisions of 10CFR50.59.

Criterion 2 of the July 22, 1993 NRC final policy statement states, "A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." The seismic monitoring instrumentation system is not a system that monitors a process variable that is an initial condition for accident or transient analyses. The seismic monitoring instrumentation is also not a design feature or an operating restriction that is an initial condition of a Design Basis Accident or transient analyses since it only provides information regarding the magnitude of and the plant equipment response to a Design Basis earthquake. Therefore, the current LGS seismic monitoring instrumentation TS requirements do not meet Criterion 2 of the July 22, 1993 NRC final policy statement.

Criterion 3 of the July 22, 1993 NRC final policy statement states, "A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier." The LGS seismic monitoring instrumentation system does not provide a function or actuate in order to mitigate the consequences of a Design Basis Accident or transient. Therefore, the current LGS seismic monitoring instrumentation TS requirements do not meet Criterion 3 of the July 22, 1993 NRC final policy statement.

Criterion 4 of the July 22, 1993 NRC final policy statement states, "A structure, system or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety." Operating experience has shown that the LGS seismic monitoring instrumentation system has no impact on public health and safety as defined by the NRC final policy statement. Furthermore, LGS specific probabilistic risk assessment (PRA) does not credit the seismic monitoring instrumentation system as a significant factor in the plant response to an accident. Therefore, the current LGS seismic monitoring instrumentation TS requirements do not meet Criterion 4 of the July 22, 1993 NRC final policy statement for determining those requirements that should remain in TS. This conclusion is consistent with the function of the seismic monitoring instrumentation system stated above.

These proposed TS changes will maintain the current operation, maintenance, testing, and system operability controls of the seismic monitoring instrumentation system. Furthermore, any future changes to the seismic monitoring instrumentation system will be evaluated for the effect of the those changes on system reliability as required by 10CFR50.59. The seismic monitoring instrumentation system performance will not decrease due to these proposed TS changes and the system will continue to be administratively controlled in accordance with TS Section 6, including the requirements of 10CFR50.59, thereby precluding a future decrease in its performance.

In accordance with the current TS Section 3.3.7.2, with the seismic monitoring instrumentation inoperable, the plant would not be required to shutdown and the provisions of TS Section 3.0.3 (i.e., plant shutdown) would not be applicable. Therefore, the inoperability of this system and therefore the consequences of an accident while this system is inoperable, was previously evaluated as not significant enough to require a change to the plant operating condition.

Since the seismic monitoring instrumentation system does not monitor a process variable that is an initial condition for an accident or transient analyses, or actuates any accident mitigation feature, and since the operation, maintenance, testing, and modification of the seismic monitoring instrumentation system will continue to be administratively controlled, including the requirements of 10CFR50.59; therefore, maintaining the reliability of the system, the proposed TS changes will not involve an increase in the probability or consequences of an accident previously evaluated.

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

The function of the seismic monitoring instrumentation system is to monitor the magnitude and effect of a seismic event only. The proposed TS changes to relocate the seismic monitoring instruments requirements from TS to the UFSAR are in accordance with the criteria for determining those requirements that should remain in the TS as defined by the NRC in its final policy statement, dated July 22, 1993. The seismic monitoring instrumentation system does not monitor a process variable that is an initial condition for an accident or transient analyses. The seismic monitoring instrumentation is also not a design feature or an operating restriction that is an initial condition of a Design Basis Accident or transient analyses since it only provides information regarding the magnitude of and the plant equipment response to a Design Basis earthquake.

These proposed TS changes to relocate the TS requirements to the UFSAR will not alter the operation of the plant, or the manner in which the seismic monitoring instrumentation system will perform its function, and any future changes will continue to be administratively controlled in accordance with TS Section 6, including the requirements of 10CFR50.59.

These proposed TS changes will not impose new conditions nor result in new types of equipment which will result in different types of malfunctions of equipment important to safety than any type previously evaluated.

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

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

These proposed TS changes to relocate the seismic monitoring instrumentation requirements from TS to the UFSAR are in accordance with the criteria for determining those requirements that should remain in the TS as defined by the NRC in final policy statement, dated July 22, 1993.

Criterion 1 of the NRC final policy statement states, "Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary." The NRC final policy statement explains that "...This criterion is intended to ensure that Technical Specifications control those instruments specifically installed to detect excessive reactor coolant leakage. This criterion should not, however, be interpreted to include instrumentation to detect precursors to reactor coolant pressure boundary leakage or instrumentation to identify the source of actual leakage (e.g., loose parts monitor, seismic instrumentation, valve position indicators)." Based on the above NRC guidance, the LGS UFSAR, and TS Bases 3.3.7.2, the seismic monitoring instrumentation does not detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. Therefore, the current LGS seismic monitoring instrumentation TS requirements do not meet Criterion 1. Furthermore, operating experience has shown

that the LGS seismic instrumentation system has no impact on public health and safety as defined by the NRC final policy statement. In addition, the LGS specific PRA does not credit the seismic monitoring instrumentation system as a significant factor in the plant response to accidents.

The seismic monitoring instrumentation LCO, SRs, and associated tables and Bases proposed for relocation to the LGS UFSAR will continue to be implemented by administrative controls that will satisfy the applicable requirements of TS section 6 "Administrative Controls." Those requirements include a review of future changes to the system and applicable administrative controls in accordance with the provisions of 10CFR50.59.

Accordingly, based on the above discussion of NRC specific guidance, operating experience, and continued imposition of administrative controls, the proposed TS changes do not involve a reduction in a margin of safety.

Information Supporting an Environmental Assessment

An Environmental Assessment is not required for the Technical Specifications (TS) changes proposed by this Change Request because the requested changes to the Limerick Generating Station (LGS), Units 1 and 2, TS conform to the criteria for "actions eligible for categorical exclusion," as specified in 10CFR51.22(c)(9). The proposed TS changes do not involve a Significant Hazards Consideration as discussed in the preceding safety assessment 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 TS changes do 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 these proposed changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS), and have concluded that they do not involve an unreviewed safety question, and will not endanger the health and safety of the public.