

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-6591

June 30, 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. 94-16-0

Gentlemen:

PECO Energy Company is submitting Technical Specifications (TS) Change Request No. 94-16-0, in accordance with 10 CFR 50.90, requesting an amendment to the TS (Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. This proposed change will relocate selected recirculation and control rod block instrumentation setpoints from TS Table 3.3.6-2, and Section 3/4.4.1 to the Core Operating Limits Report (COLR), thereby revising TS Section 6.9.1.9 to document relocation of these items into the COLR. Information supporting this 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.

We request that, if approved, the amendment to the LGS Units 1 and 2 TS be issued on September 1, 1994, and be made effective immediately upon issuance.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "G.A. Hunger, Jr.".

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

Attachments

cc: T. T. Martin, Administrator, Region I, USNRC - w/ attachments
N. S. Perry, USNRC Senior Resident Inspector, LGS - w/attachments
R. R. Janati, Director, PA Bureau of Radiological Protection - w/attachments

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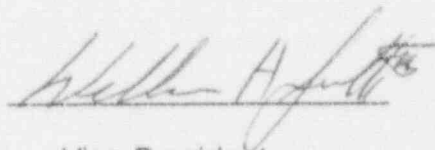
COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

W. H. Smith, III, being first duly sworn, deposes and says:

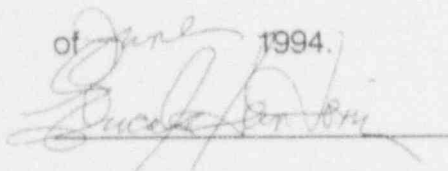
That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the foregoing Application for Amendment of Facility Operating License Nos. NPF-39 and NPF-85 (Technical Specifications Change Request No. 94-16-0), to relocate selected recirculation and control rod block instrumentation setpoints from Technical Specifications to the Core Operating Limits Report, at Limerick Generating Station, Units 1 and 2, 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.



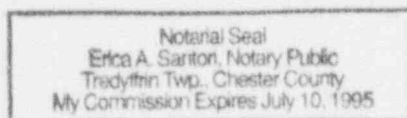
Vice President

Subscribed and sworn to
before me this 29 day

of June 1994.



Notary Public



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

No. 94-16-0

**"Relocation of Selected Recirculation and Control Rod
Block Instrumentation Setpoints from Technical Specifications
to the Core Operating Limits Report."**

Supporting Information for Changes - 4 pages

PECO Energy Company, Licensee under Facility Operating License Nos. 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 to the Operating License be amended as proposed herein, to relocate selected recirculation and control rod block instrumentation setpoints from TS Table 3.3.6-2 and Section 3/4.4.1 to the Core Operating Limits Report (COLR), thereby revising TS Section 6.9.1.9 to document relocation of these items into the COLR. The proposed changes to the TS are indicated by the vertical bars in the margin of the TS pages 3/4 3-60a, 3/4 4-2 and 6-18a. The TS pages showing the proposed changes are contained in Attachment 2.

Since these TS changes will result in significant savings to PECO, we request that, if approved, the amendments to the LGS Units 1 and 2 TS be issued on September 1, 1994, and be made effective immediately upon issuance.

This TS 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 the Proposed Changes

The proposed Technical Specifications (TS) Change Request involves the change of the LGS Reactor Coolant Recirculation System and Control Rod Block Instrumentation Technical Specifications (i.e., Section 3/4.4.1 and Table 3.3.6-2) to move the setpoint values for the recirculation pump Motor-Generator (MG) set mechanical and electrical stops and the control rod block instrumentation reactor coolant system recirculation flow upscale trip to the Core Operating Limits Report (COLR). Moving these setpoint values to the COLR will allow cycle dependant changes to be made without application for a TS amendment. These setpoint values can then be changed from cycle to cycle and within an operating cycle to maximize thermal margins. TS Section 6.9.1.9, "Core Operating Limits Report," must also be changed to reflect the addition of these setpoint values to the COLR.

Technical Specification, Section 3/4.4.1, "Recirculation System - Recirculation Loops," paragraph 4.4.1.1.2, states:

"Each pump MG set scoop tube mechanical and electrical stop shall be demonstrated OPERABLE with overspeed setpoints less than or equal to 109% and 107%, respectively, of rated core flow, at least once per 24 months."

With the advent of Average Power Range Monitor - Rod Block Monitor Technical Specifications/Maximum Extended Load Line Limit Analysis (AFTS/MELLLA), in conjunction with Increased Core Flow (ICF), a single, cycle independent set of overspeed setpoints may deny the core designer and plant operator a method to ensure a comfortable operating margin while optimizing core/fuel cycle design. To obtain this flexibility, it is recommended that TS Section 3/4.4.1 be changed to place the subject setpoint values in the COLR. With the setpoint values in the COLR, TS Section 3/4.4.1 would read:

"Each pump MG set scoop tube mechanical and electrical stop shall be demonstrated OPERABLE with overspeed setpoints less than or equal to the setpoints as noted in the CORE OPERATING LIMITS REPORT, as a percentage of rated core flow, at least once per 24 months."

The proposed changes will relocate the recirculation pump MG set mechanical and electrical overspeed stop setpoints from TS Section 3/4.4.1 to the COLR.

Technical Specifications Table 3.3.6-2, "Control Rod Block Instrumentation Setpoints", will also be revised to remove the trip setpoint and allowable value for the Reactor Coolant System Recirculation Flow Upscale from the TS and to refer to COLR for these setpoints.

Technical Specifications Section 6.9.1.9, "Core Operating Limits Report", lists the values that are documented within the report. Paragraphs g. and h. should be added to document the relocation of the recirculation pump MG set mechanical and electrical overspeed stop setpoints from TS Section 3/4.4.1 and the control rod block flow upscale trip setpoint and allowable value from TS Table 3.3.6-2 into the COLR.

- "g. The Reactor Coolant System Recirculation Flow upscale trip setpoint and allowable value for Specification 3.3.6,
- h. The Recirculation MG set mechanical and electrical overspeed stop setpoints for Specification 4.4.1.1.2."

Whereas LGS Unit 2 currently does not operate with ARTS/MELLLA, a similar change can be made at this time to Unit 2 TS to preserve continuity of steps and similarity between Unit 1 and Unit 2 TS until ARTS/MELLLA is implemented at LGS Unit 2. The only difference (for Unit 2 TS) to the change delineated above is in Technical Specification Section 6.9.1.9 (i.e., added paragraphs g. and h. should be identified as f. and g. respectively).

Therefore, we propose that TS Table 3.3.6-2, Sections 3/4.4.1 and 6.9.1.9 be changed to reflect the relocation of selected recirculation and control rod block instrumentation setpoints from the TS to the COLR.

Safety Assessment

The proposed TS changes are administrative in nature. The relocation of selected recirculation and control rod block instrumentation setpoints from the TS to the Core Operating Limits Report (COLR), does not impact the associated TS Limiting Conditions for Operation (LCOs), surveillance requirements and setpoint values. These changes do not affect existing accident analyses or design assumptions, nor do they impact any safety limits of the plant. Safety-related plant equipment such as the fuel, reactor vessel and recirculation system equipment remains unchanged. Moving these setpoints to the COLR will allow cycle dependent changes to be made without a TS amendment.

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), which will relocate selected recirculation and control rod block instrumentation setpoints from TS Table 3.3.6-2 and Section 3/4.4.1 to the Core Operating Limits Report (COLR), thereby revising TS Section 6.9.1.9 to document relocation of these items into the COLR, 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 TS change proposed is the relocation of the recirculation pump Motor-Generator (MG) set mechanical and electrical stop and control rod block recirculation flow upscale trip setpoint values to the COLR. No physical plant equipment change is proposed. The TS requirements for the setpoints and the associated surveillance requirements remain unchanged. Only the location of the setpoint values will be changed. The subject setpoint values will become cycle dependant and will be determined by NRC approved methods, as are the balance of setpoints and thermal limits found in the COLR. However, the subject setpoint values are not modified as part of this TS change.

Therefore, the proposed TS change does 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 TS changes proposed are the relocation of the recirculation pump MG set mechanical and electrical stop and control rod block recirculation flow upscale trip setpoint values to the COLR. No physical plant equipment change is part of the proposed TS changes. The TS LCDs and surveillance requirements remain unchanged. The only change proposed is the relocation of the subject setpoint values as noted above. These setpoint values have been determined in accordance with previously NRC approved methods and assure sufficient operating margins in accordance with existing core design methodology. Therefore, the proposed TS changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The following TS BASES were reviewed for potential reduction in the margin of safety:

- 3/4.2 Power Distribution Limits
- 3/4.3.6 Control Rod Block Instrumentation
- 3/4.4.1 Recirculation System

The margin of safety, as defined in the TS BASES, will not be reduced. The proposed TS changes do not affect existing accident analyses or design assumptions, nor do they impact any safety limits of the plant, since they are administrative in nature.

Therefore, 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 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 10 CFR 51.22(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 effluents that may be released offsite. In addition, the proposed 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 TS and have concluded that they do not involve an unreviewed safety question, and will not endanger the health and safety of the public.