



PECO ENERGY

Station Support Department

10 CFR 50.90

10 CFR 50.12

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

July 22, 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. 94-26-0
and Request for Exemption

Gentlemen:

PECO Energy Company is submitting Technical Specifications (TS) Change Request No. 94-26-0, in accordance with 10 CFR 50.90, 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. In addition PECO is requesting a one-time schedular exemption, for LGS Unit 2, from 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," in accordance with 10 CFR 50.12(a).

TS Change Request No. 94-26-0 involves the removal of surveillance frequency details governing 10 CFR 50, Appendix J, 'B' and 'C' Type testing from TS. The Request for Exemption involves exemption from the two year test interval for Type 'B' and 'C' leak rate tests required by 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3.

Information supporting this TS Change Request and Exemption Request is contained in Attachment 1 to this letter, the proposed replacement pages for the LGS TS are contained in Attachment 2, and the list of surveillance tests for which the exemption would apply is contained in Attachment 3.

We request that, if approved, this TS Change Request for LGS, Units 1 and 2, and request for exemption for LGS Unit 2, be approved prior to January 24, 1995 in support of the current surveillance interval end dates.

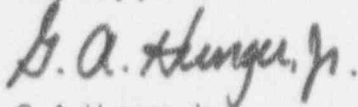
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If you have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, reading "G. A. Hunger, Jr." in a cursive style.

G. A. Hunger, Jr.
Director - Licensing

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)
R. R. Janati, PA Bureau of Radiological Protection (w/attachments and enclosure)

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 enclosed Technical Specifications Change Request No. 94-26-0 "Removal of Surveillance Frequency Details Governing 10 CFR 50, Appendix J, 'B' and 'C' Type Testing from Technical Specifications," 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 22nd day
of July 1994.


Notary Public

Notarial Seal
Erica A. Santori, Notary Public
Tredyffrin Twp., Chester County
Commission Expires July 10, 1995

ATTACHMENT 1

LIMERICK GENERATING STATION
UNIT 1 AND UNIT 2

Docket Nos.

50-352

50-353

License Nos.

NPF-39

NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST

NO. 94-26-0

AND EXEMPTION

"Removal of Surveillance Frequency Details Governing 10 CFR 50,
Appendix J, 'B' and 'C' Type testing from Technical Specifications and
Request for Exemption From the Two Year Test Interval for
Type 'B' and 'C' Leak Rate Tests."

Supporting Information for Changes and Exemption - 6 PAGES

PECO Energy Company, 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 License be amended, as proposed herein, to remove surveillance frequency details governing 10 CFR 50, Appendix J, 'B' and 'C' Type testing from TS, prior to January 24, 1995. In addition, coincident with the TS Change request, PECO requests a one-time Exemption from the two year test interval for Type 'B' and 'C' leak rate tests required by 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3. This TS Change Request and Exemption Request are necessary to continue Unit 2 operation within its 24 month operating cycle, until its scheduled third refueling outage, scheduled to begin January 28, 1994.

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

Discussion and Description of the Proposed TS Changes

The proposed activity requests a permanent change to the TS for LGS, Units 1 and 2, to remove repetitious surveillance details from TS Sections 4.6.1.2.d, 4.6.1.2.f, and 4.6.1.2.h, which are also found in 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3. The rewording is considered a presentation preference which is administrative in nature. This proposed presentation is in accordance with NUREG-1433, "Standard Technical Specifications." This change is requested in coincidence with a Request for Exemption to support the third, Unit 2, operating cycle.

Safety Assessment

The proposed TS change involves rewording of the LGS TS. These changes, since they do not involve technical changes to the TS, are administrative.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the proposed changes to the Limerick Generating Station, Unit 1 and Unit 2, Technical Specifications, which will remove repetitious surveillance details from TS, 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 changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes involve the removal of repetitious surveillance details from TS also found in 10 CFR 50, Appendix J, and rewording of TS. The removal and rewording involves no technical changes to the existing TS. The changes to the existing TS are proposed in order to be consistent with NUREG-1433. During the development of NUREG-1433, certain wording preferences or English language conventions were adopted. The proposed changes to this TS

section are administrative in nature and do not impact initiators of analyzed events. They also do not impact the assumed mitigation of accidents or transient events. Therefore, the changes do not involve a significant 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 proposed changes do not involve a physical alteration of the plant or changes in methods governing normal plant operation. The proposed changes will not impose any new or different requirements or eliminate any existing requirements. Therefore, the 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.

The changes are administrative in nature and will not involve any technical changes. The proposed changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. In addition, because the changes are administrative in nature, no question of safety is involved. Therefore, the changes do not involve a significant reduction in a margin of safety.

Conclusion of TS Change Request

The Plant Operations Review Committee and the Nuclear Review Board have reviewed these proposed changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications, and have concluded that they do not involve an unreviewed safety question.

Discussion and Justification For Exemption Request

An exemption from 10 CFR 50, Appendix J, is necessary due to a schedular difference between the Unit 2 end of third cycle shutdown date, and the expiration date of certain (specified in Attachment 3) Type 'B' and 'C' test intervals. Sections III.D.2(a) and III.D.3 of 10 CFR 50, Appendix J, require that Type 'B' and 'C' containment penetration leak rate tests shall be performed at intervals no greater than two years. The next LGS, Unit 2 refueling shutdown is scheduled to begin January 28, 1995. Therefore, PECO Energy Company requests a one-time (i.e., temporary) schedular exemption from these requirements for the Limerick Generating Station (LGS), surveillance tests (STs) identified in Tables 1, 2, 3, and 4, of Attachment 3 for varying durations of 1 to 26 days, depending on the particular test contained in Attachment 3. The Tables in Attachment 3, are grouped by 7 day periods, where Table 1 contains the two year intervals that will expire prior to January 28, 1995, and Table 2, 3, and 4 contain the test intervals that will expire in the periods that follow, up to February 19, 1995. Due to shutdown schedule changes and / or in anticipation of poor weather conditions, resulting in the need for continued Unit 2 operation, similar to the conditions PECO

experienced at the beginning of 1994, we are including Tables 2, 3, and 4 which list penetrations whose two year test intervals will expire, if not tested between January 28, 1995 and February 18, 1995. If granted, extension will be applied to the current expiration date of each ST listed on Tables 1, 2, 3, and 4, not to exceed February 19, 1995.

Exemptions are being requested in order 1) to avoid an extended reactor shutdown in order to comply with the two year testing interval, and 2) to allow for shutdown scheduling flexibility following the third, Unit 2, operating cycle. LGS Unit 2 is now utilizing a new core design which allows the intervals between reactor shutdowns for refueling to extend beyond the maximum-allowable, two-year testing period. Prior to the current operating cycle, local leak rate tests were performed in conjunction with an 18 month refueling cycle. Use of the extended-cycle, core designs has been recognized as a growing trend in the industry as discussed in Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991.

Attachment 3 contains a list of the 22 leak rate tests where the two-year interval will expire prior to January 28, 1995 and 46 additional tests which have the potential to expire, prior to shutdown, due to unforeseen shutdown schedule changes. PECO Energy requests exemption for all 68 tests for a period not to exceed February 19, 1995 (i.e., 1 to 26 days). Performance of these tests at the scheduled two-year interval would result in undue financial hardship with little or no compensating increase in the level of safety or quality. Extending the testing interval no more than 26 days will not significantly impact the integrity of the containment boundary and, therefore, would not significantly impact the consequences of an accident or transient in the unlikely occurrence of an event during the 26 days of power operation. This minimal impact on primary containment integrity has been further reduced through the demonstration of a large margin in primary containment integrity, described below.

A large margin in primary containment integrity can be demonstrated by review of the total Type 'B' and 'C' minimum pathway leak rates. The Unit 2, as-left, minimum pathway leak rates, following the second, Unit 2 refueling outage, was $.13 L_a$ or 20,625 standard cubic centimeters per minute (sccm) (including contributions from the Main Steam Isolation Valves (MSIVs)), with a maximum pathway leak rate of $.27 L_a$ or 42,502 sccm (excluding MSIV leakage in accordance with LGS's current Appendix J, Exemption). These as-left, leak rates represent a significant margin to the maximum-allowable pathway leakage (i.e., L_a) of 158,273 sccm. Extending the two-year interval an additional 1 to 26 days for any one specified ST contained in Attachment 3, not to exceed February 19, 1995, would not be expected to significantly reduce this margin, even considering the extended operating cycle, to the point that primary containment integrity would be violated.

The NRC may, upon application, grant exemptions from the requirements of 10CFR50, where special circumstances are present. 10 CFR 50.12(a)(2)(ii) defines such a circumstance where, "Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule..." The underlying purpose of 10 CFR 50, Appendix J,

Sections III.D.2(a) and III.D.3, is to establish and maintain a level of confidence that any primary containment leakage, during a hypothetical design basis accident, will remain less than or equal to the maximum allowable value, L_a , established by 10CFR50, Appendix J, by performing periodic Type 'B' and 'C' testing. 10CFR50, Appendix J, requires that the Unit 2, Type 'B' and 'C' tests be performed at intervals no greater than two years. This is not necessary to achieve the underlying purpose of the rule, as explained in the above technical justification. The technical justification supports the conclusion that the requested schedular exemption to extend specified, Unit 2, Type 'B' and 'C' test intervals, no more than 26 days, will maintain the same level of confidence that any Unit 2 primary containment leakage will remain less than or equal to the maximum allowable leakage rate value, L_a , during the proposed one-time extension.

10 CFR 50.12(a)(2)(iii) states that the NRC may grant exemptions from requirements of 10 CFR 50 where, "Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated..." The current LGS Unit 2, Type 'B' and 'C' test schedule established by 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3, will require that Unit 2 be shutdown prematurely during its current fuel cycle schedule. This current testing schedule will result in unnecessary costs associated with an increase in the refueling outage length due to planned outage activity constraints. Use of the extended-cycle, core designs has been recently recognized as a growing trend in the industry as discussed in Generic Letter 91-04.

Finally, 10 CFR 50.12(a)(2)(v) states that the NRC may grant exemptions from requirements of 10 CFR 50 where, "The exemption would provide only temporary relief from the applicable regulation and the licensee or applicant has made good faith efforts to comply with the regulation..." The requested exemption would provide only temporary relief pertaining to specified (contained in Attachment 3) third operating cycle, Unit 2, Type 'B' and 'C' test intervals, and as stated above, the underlying purpose of the rule is achieved.

Information Supporting an Environmental Assessment

An Environmental Assessment is not required for the Technical Specifications changes proposed by this Change Request because the requested changes to the Limerick Generating Station, 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 change will have no impact on the environment. 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 off-site. In addition, the proposed TS changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

With respect to the requested exemption for LGS, Unit 2, the following information is provided to support an Environmental Assessment.

Identification of Proposed Action

The proposed action is to grant an exemption from 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3, which require that Type 'B' and 'C' containment penetration leak rate tests be performed during reactor shutdown for refueling, or other convenient intervals, but in no case greater than two years. This one-time exemption would allow the two year interval to be exceeded by no more than 26 days, for the Licensee specified penetrations contained in Attachment 3.

The Need for the Proposed Action

The requested exemption is needed because the requirements of 10 CFR 50, Appendix J, would require that the 10 CFR 50, Appendix J, Type 'B' and 'C' tests be performed at a time inconvenient with respect to the Unit 2 shutdown schedule, resulting in unnecessary costs associated with an increase in the refueling outage length due to planned outage activity constraints. In addition, the proposed action will provide shutdown scheduling flexibility and add contingencies for unforeseen outage work changes and weather restrictions.

Environmental Impacts of the Proposed Action

The requested exemption would not significantly increase the probability of exceeding the maximum allowable value of expected primary-containment leakage (i.e., L_a , established by 10 CFR 50, Appendix J), during a hypothetical design basis accident; therefore, the primary containment integrity would be maintained. Although the requirements in 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3 state that Type 'B' and 'C' tests shall be performed at two-year intervals, we have concluded that performing the Type 'B' and 'C' tests for the specified penetrations no more than 26 days beyond two years for any specified test contained in Attachment 3, not to exceed February 19, 1995, would meet the underlying purpose of the rule, that any primary containment leakage during a hypothetical design basis accident will remain less than the maximum allowable leakage rate value, L_a , established by 10 CFR 50, Appendix J. This determination was made based on the preceding demonstration of a large margin in primary containment integrity.

Accordingly, the consequences of an accident would not be increased, that is, the post-accident radiological releases would not be greater than previously determined. The requested exemption would not affect plant radiological effluents. Therefore, there are no significant, radiological-environmental impacts associated with the requested exemption. With regard to potential non-radiological impacts, the requested exemption involves a one-time schedular change to surveillance and testing requirements. It does not affect non-radiological plant effluents and has no other environmental impact.

Alternative to the Proposed Action

Since we have concluded that there is no significant environmental impacts associated with the requested exemption, any alternatives would have either no or greater environmental impact.

The principal alternative would be to deny the requested exemption which would require the performance of 10 CFR 50, Appendix J, Type 'B' and 'C' tests, which would require a premature shutdown at a time inconvenient with respect to the Unit 2 refueling outage schedule. This would not reduce the environmental impact attributed to the facility as compared to the impact of granting the requested exemption.

Alternative Use of Resources

This proposed exemption does not involve the use of any resources not previously considered in connection with the Nuclear Regulatory Commission's Final Environmental Statement dated, April 1984, related to the operation of the Limerick Generating Station, Unit 1 and Unit 2.

Information Supporting a Finding of No Significant Impact

We have concluded, based on the preceding environmental assessment, that the proposed action will not have a significant effect on the quality of the human environment, therefore, an environmental impact statement for the requested exemption would not be required.