



PECO ENERGY

PECO Energy Company
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July 28, 1994

Docket Nos. 50-277

50-278

50-352

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License Nos. DPR-44

DPR-56

NPF-39

NPF-85

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Limerick Generating Station, Units 1 and 2
Response to NRC Generic Letter 88-20, Supplement 4,
"Individual Plant Examination of External Events for
Severe Accident Vulnerabilities"

Reference: 1) Letter from D. R. Helwig, (PECO Energy) to NRC dated
December 26, 1991

2) Letter from G. J. Beck (PECO Energy) to NRC dated
September 18, 1992

Dear Sir:

Our reference letter 1 provided PECO Energy Company's (PECO Energy) response to Generic Letter 88-20, Supplement 4, wherein we identified the methods and approach for performing the Individual Plant Examination of External Events (IPEEE) at Peach Bottom Atomic Power Station (PBAPS) and Limerick Generating Station (LGS). The selected method for the seismic events portion was the Electric Power Research Institute (EPRI) seismic margin assessment (SMA) as described in NUREG-1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities."

The purpose of this letter is to inform you of our decision to change the scope of review for the seismic events portion of the IPEEE. PECO Energy remains committed to the EPRI SMA, but believes that the binning as described in NUREG-1407 is no longer appropriate. Based on new seismic hazard estimates developed by Lawrence Livermore National Laboratory (LLNL) and published in NUREG-1488, "Revised Livermore Seismic Hazard Estimates for 69 Nuclear Power Plant Sites East of the Rocky Mountains," PECO Energy has decided that for both PBAPS and LGS a focused-scope SMA is no longer warranted, and a reduced-scope SMA is more appropriate. The reasons are as follows:

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July 28, 1994

Page 2

- The 1993 LLNL results demonstrate that the seismic hazard is much less than what the NRC staff originally believed.
- The probability of exceeding the safe shutdown earthquake (SSE) using the revised 1993 LLNL mean hazard results is less than the mean probability of exceeding the SSE at the reduced scope plants identified in NUREG-1407.
- The probability of exceeding the SSE based upon 1993 LLNL mean hazard results is less than the probability of exceeding the 0.3g NUREG/CR-0098, "Development of Criteria for Seismic Review of Selected Nuclear Power Plants," review level spectrum based on the 1989 LLNL mean hazard results.

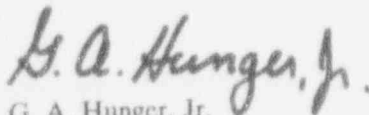
In light of the conclusions drawn from NUREG-1488, the reduced-scope SMA provides the most cost effective method for satisfying the goals of the seismic IPEEE. The detailed walkdowns which are the key element of this approach are the most beneficial aspect of the SMA and, in various studies conducted by the industry, have effectively found seismic vulnerabilities. PECO Energy is committed to performing the detailed plant walkdowns; therefore, the change in scope of review will have no impact on plant safety.

The change in the scope of review for the seismic events portion of the IPEEE does not affect the scheduled completion of the LGS and PBAPS IPEEEs, which was provided in our reference letter 2. The PBAPS IPEEE is being coordinated with the resolution of Unresolved Safety Issue A-46, "Seismic Qualification of Equipment in Operating Plants." A significant portion of the seismic walkdown effort is dictated by LGS and PBAPS refueling outage schedules. The non-seismic portions of the IPEEE are not impacted by the change in scope of review for the seismic events portion of the IPEEE. For these reasons, the LGS and PBAPS IPEEEs remain scheduled for completion by June 30, 1995, and November 20, 1995, respectively.

In conclusion, PECO Energy has determined that a reduced-scope SMA is appropriate for the seismic events portion of the IPEEE for both PBAPS and LGS, and therefore will complete the seismic events portion of the IPEEEs consistent with reduced-scope binning. PECO Energy will maintain the other commitments regarding seismic activities.

If you have any questions or require additional information, please contact us.

Very truly yours,



G. A. Hunger, Jr.
Director-Licensing

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cc: T. T. Martin, Administrator, Region I, USNRC
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS
N. S. Perry, USNRC Senior Resident Inspector, LGS
R. R. Janati, Commonwealth of Pennsylvania