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August 22, 1983

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Limerick Generating Station, Units 1 and 2  
Procedures and Test Review Branch

Reference: PECO and NRC Conference Call dated August 3, 1983

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

As a result of the discussions in the reference conference call the attached revised draft FSAR page changes addressing the availability of approved test procedures for the initial test program will be incorporated into the FSAR, exactly as it appears on the attachments, in the revision scheduled for September, 1983.

Sincerely,

  
Eugene J. Bradley

RJS/gru/13

Copy to: See Attached Service List

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cc: Judge Lawrence Brenner (w/o enclosure)  
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Atomic Safety and Licensing Board Panel (w/o enclosure)  
Docket and Service Section (w/o enclosure)

SUT-6." These procedures comply with the general guidelines and regulatory positions contained in Regulatory Guide 1.68 (Revision 2, August 1978). Test abstracts establishing the objectives, prerequisites, test method, and acceptance criteria for these procedures are presented in Table 14.2-3.

#### 14.2.11 TEST PROGRAM SCHEDULE

The schedule, relative to the initial fuel loading date, for conducting each major test phase of the initial test program is presented in Figure 14.2-1. This figure illustrates that the preoperational test program is scheduled for 15 months duration for Unit 1, 12 months duration for Unit 2, and that the subsequent startup test programs are scheduled at 3 months duration for each unit. Since Unit 2 fuel load is scheduled at 18 months after Unit 1 fuel load, the test programs do not overlap. However, if schedule compression occurs, the staffing and organization of the groups responsible for the initial test programs preclude significant divisions or dilutions of responsibility. Approved test procedures are intended to be available for NRC review at least 60 days prior to scheduled implementation.

*preoperational*

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The sequential schedules for conducting individual preoperational tests for each unit are presented in Figures 14.2-6 and Figure 14.2-7. These sequential schedules offer one possible plan for an orderly and efficient progression of testing. While these sequences may be preferred, numerous acceptable alternatives exist because few preoperational tests are dependent on performance of other preoperational tests. The actual test sequences are determined daily at the jobsite to reflect construction status, manpower availability, and test prerequisite status.

The sequential schedule for conducting Unit 1 and Unit 2 startup tests is presented in Figure 14.2-5. This schedule establishes the required order of startup testing as a function of test phase and power level. Even though this basic order of testing is required, there is still considerable flexibility in sequencing the startup testing specified to be conducted at each test phase or startup level. Detailed startup testing schedules, commensurate with the requirements of this schedule, are developed at the jobsite to schedule startup testing when operationally expedient.

# DRAFT

Copies of approved test procedures for fuel loading, initial startup testing (zero power testing), and supporting activities through Phase II of the initial test program are intended to be available for NRC examination not less than 60 days prior to the scheduled fuel load date. Copies of test procedures for Phase III (Low Power Testing) and Phase IV (Power Ascension Testing) of the initial test program are intended to be available for NRC examination not less than 60 days prior to the scheduled fuel load date. Every effort will be made to provide approved test procedures; however, if such procedures are not available, copies of draft procedures will be provided.

for Phases III and IV

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