



PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

JOHN S. KEMPER
VICE-PRESIDENT
ENGINEERING AND RESEARCH

AUG 08 1983

50-352

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&2
NUREG-0737, Item II.K.3.18, "Modification
of Automatic Depressurization System Logic"

Reference: J. S. Kemper to A. Schwencer letter dated
June 20, 1983

File: GOVT 1-1 (NRC)

Dear Mr. Schwencer:

In the reference letter we described our proposed resolution to TMI Item II.K.3.18 in which we committed to implement option 4 of the BWR Owners' Group Generic Response to NUREG-0737 with implementation to be completed by the first refueling outage after fuel load. However, a more recent and detailed review of this modification has revealed that this change can be made on Unit 1 prior to fuel load with no change in our August, 1984 fuel load date.

The attached revised draft FSAR page change to TMI Item II.K.3.18 will be incorporated into the FSAR, exactly as it appears on the attachment, in the revision scheduled for September, 1983.

Sincerely,

John S. Kemper

RJS/gra/68

Copy to: See Attached Service List

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PDR ADOCK 03000352
A PDR

cc: Judge Lawrence Brenner	(w/o enclosure)
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Ann P. Hodgdon, Esq.	(w/o enclosure)
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Judith A. Dorsey, Esq.	(w/o enclosure)
Charles W. Elliott, Esq.	(w/o enclosure)
Jacqueline I. Ruttenberg	(w/o enclosure)
Thomas Y. Au, Esq.	(w/o enclosure)
Mr. Thomas Gerusky	(w/o enclosure)
Director, Pennsylvania Emergency Management Agency	(w/o enclosure)
Mr. Steven P. Hershey	(w/o enclosure)
Angus Love, Esq.	(w/o enclosure)
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David Wersan, Esq.	(w/o enclosure)
Robert J. Sugarman, Esq.	(w/o enclosure)
Martha W. Bush, Esq.	(w/o enclosure)
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Atomic Safety and Licensing Appeal Board	(w/o enclosure)
Atomic Safety and Licensing Board Panel	(w/o enclosure)
Docket and Service Section	(w/o enclosure)

- a. Outage date
- b. Duration of outage
- c. Cause of outage
- d. Emergency core cooling system or component involved
- e. Corrective action taken

The above information will be assembled into a report, which will also include a discussion of any changes, proposed or implemented, deemed appropriate, to improve the availability of the emergency core cooling equipment.

• II.K.3.13 MODIFICATION OF ADS LOGIC - FEASIBILITY FOR INCREASED DIVERSITY FOR SOME EVENT SEQUENCES

Position

The automatic depressurization system (ADS) actuation logic should be modified to eliminate the need for manual actuation to assure adequate core cooling. A feasibility and risk assessment study is required to determine the optimum approach. One possible scheme that should be considered is ADS actuation on low reactor-vessel water level provided no high pressure coolant injection or high pressure core spray flow exists and a low pressure emergency core cooling (ECC) system is running. This logic would complement, not replace, the existing ADS actuation logic.

Response

The BWR Owners Group has submitted a report in NEDO-24951 to the NRC in which they propose five options to address this concern. Limerick will take steps to make the required modifications to the ADS logic when the NRC rules on the acceptability of the proposed options. This modification will be implemented during the first refueling outage.

- Option 4, as outlined in the BWR Owners' Group Generic Response to NUREG-0737
- II.K.3.21 RESTART OF CORE SPRAY AND LPCI SYSTEMS Item II.K.3.18 will

Position

The core spray and LPCI system flow may be stopped by the operator. These systems will not restart automatically on loss of water level if an initiation signal is still present. The core spray and LPCI system logic should be modified so that these systems will restart if required to assure adequate core cooling. Because this design modification affects several core cooling modes under accident conditions, a preliminary design should be submitted for staff review and approval prior to making the actual modification.

be implemented prior to fuel load. Specifically, modifications will be made to add a timer which would bypass the high drywell pressure permissive after a sustained low water level and to add an ADS manual inhibit switch.