

William H. Smith, III
Vice President
Station Support

10CFR50.71(e)(4)
10CFR50.54(a)(3)

PECO Energy Company
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October 28, 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
Submission of Revision 4 of the
Updated Final Safety Analysis Report

Dear Sirs:

In accordance with 10CFR50.71(e)(4) and 10CFR50.4(b)(6), this letter submits one original and ten (10) copies of Revision 4 of the Updated Final Safety Analysis Report (UFSAR) for Limerick Generating Station (LGS), Units 1 and 2. The enclosed copies of Revision 4 are being provided to the NRC on a replacement page basis with a list of effective pages identifying the latest revision date of all current pages in accordance with 10CFR50.71(e)(1). In each revision package, we have also provided page replacement instructions for incorporating Revision 4 into the NRC copies of the LGS UFSAR. As required by 10CFR50.71(e)(5), each replacement page includes a bold vertical line in the margin adjacent to each area changed and the date of change is included on each page. Revision 4 reflects changes made up to a maximum of six months prior to this submittal in accordance with the requirements of 10CFR50.71(e)(4). As a result, the UFSAR Revision 4, has been made to reflect changes made to LGS, Units 1 and 2, under the provision of 10CFR50.59, at least up to May 1, 1994.

The enclosed UFSAR Revision 4 also contains the annual revision of the Quality Assurance (QA) Program Description which is being submitted in accordance with 10CFR50.54(a)(3). The updated QA Program Description (i.e., Section 17.2 of the UFSAR Revision 4) reflects editorial and organizational changes and those changes described in Attachment 1 as required by 10CFR50.54(a)(3)(ii) since the previous submittal.

Based on the information provided in Attachment 1, we have concluded that the QA Program Description changes included in Revision 4 of the UFSAR do not reduce the commitments in the QA Program Description previously accepted by the NRC.

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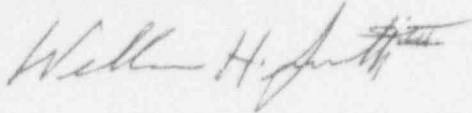
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As required by 10CFR50.71(e)(2)(i), I certify that to the best of my knowledge, Revision 4 of the UFSAR accurately reflects information and analyses submitted to the NRC, or prepared pursuant to NRC requirements as described above. In addition, as required by 10CFR50.71(e)(2)(ii), Attachment 2 to this letter identifies changes made under the provision of 10CFR50.59 and included in the enclosed Revision 4, but not previously submitted to the NRC.

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

Very truly yours,

A handwritten signature in dark ink, appearing to read "William H. Smith". The signature is fluid and cursive, with a prominent "W" and "S".

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)

ATTACHMENT 1

PECO ENERGY COMPANY
LGS UPDATED FINAL SAFETY ANALYSIS REPORT
CHAPTER 17 - QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGES
LGS UFSAR REVISION 4

<u>Paragraph No.</u>	<u>Description of Change</u>	<u>Change Classification</u>
Various 17.2	Changed "PECo" to "PECO Energy"	Organizational
Various 17.2	Changed "Nuclear Group" to "Nuclear Generation Group"	Organizational
Various 17.2	Changed "Sr. Vice President, Nuclear" to "Sr. Vice President and Chief Nuclear Officer"	Organizational
Various 17.2	Changed "Audit(s)(ed)" to "Assess(ment)(ments)(ed)," etc.	Note 1
Various 17.2	Changed "QA Plan" to "NQA Program"	Editorial
17.2.1	Changed the quantities of Vice Presidents, Changed "Production" to "Power Generation"	Organizational Organizational
17.2.1.2.3	e. Changed "(CARS & MCARS)" to "(level 2&3 CAR issues)"	Editorial
	i. Changed "QA Plan" to "Quality Assurance Program Description"	Note 5
17.2.1.2.3.1.1	Deleted "of a Superintendent, who reports to"	Note 4
	Changed "Superintendent" to "Manager"	Note 4
	a. Deleted "and technical direction" (this responsibility is included in 17.2.1.2.3.1.a)	Note 4
	d. Deleted; succeeding items renumbered (there are no longer separate QS and Assessment Superintendents)	Note 4
	g. Deleted; (this responsibility is included in 17.2.1.2.3.1.j); succeeding items renumbered.	Note 4

17.2.1.2.3.1.2	b. Changed "inspection" to "verification"; Deleted "radwaste/radmaterial packaging, handling, and shipment;"	Clarification Note 6
	c. Deleted "Assessment Superintendent, Quality Support Superintendent, and"	Note 4
	f. Changed "QV Inspection" to "Quality Verification"	Clarification
	g. Changed "inspections" to "verifications"	Clarification
	k. Deleted, (NDE transferred out of NQA)	Note 3
	l. Deleted	Note 3
17.2.1.2.3.1.3	Deleted "a Superintendent, who reports to"	Note 4
	Changed "Superintendent" to "Manager"	Note 4
	a. Deleted "and technical direction"	Note 4
	b. Deleted; (section superintendents)	Note 4
	c. Deleted; (included in 17.2.1.2.3.1.j), succeeding items were renumbered	Note 4
	d. (was f.) Deleted "procurement documents and"	Note 2
17.2.1.2.3.3	Changed "three" (sections) to "two"; Deleted "NDE Support" and "Training Coordinator"	Organizational
	d. Deleted "procurement controls"; Succeeding items were renumbered	Note 2
17.2.1.2.3.3.1	Deleted "a superintendent, who reports to" changed "Superintendent" to "Manager"	Note 4 Note 4
	a. Deleted "and technical direction"	Note 4
	c. Deleted "Review and approval of procurement documents and specifications"; Succeeding items were renumbered	Note 2
17.2.1.2.3.3.2	Deleted entire section (NDE Support Section). Renumbered succeeding sections.	Note 3

17.2.1.2.3.3.2	(was 17.2.1.2.3.3.3) Deleted "a superintendent, who reports to"; Changed "Superintendent" to "Manager"	Note 4 Note 4
	b. Deleted "Maintenance of QA tracking & Trending system for nonconformances" - The system has been replaced with a computer system maintained by Station Support. Succeeding items were renumbered.	Editorial
	c. Deleted (keeping NQA Superintendents current), succeeding items were renumbered	Note 4
	g. Deleted (superintendent advising the manager), succeeding items were renumbered	Note 4
	i. Deleted review of QA Plan	Note 5
17.2.1.3	Changed "Production Organization" to "Power Generation Group"; deleted "The organization of Production is shown in Figure 17.2.6"; added "Sr" to Vice President title.	Organizational Editorial
17.2.1.4	Deleted "The organization of Support Services is shown in Figure 17.2-9-11."	Editorial
17.2.1.5	Deleted "The organization of the Legal Department is shown in Figure 17.2-10."	Editorial
17.2.2.8	Replaced paragraph which described the QA Plan.	Note 5
17.2.2.9	Replaced QA Plan controls with Policy, Directive, and Procedure controls.	Note 5
17.2.2.10	Changed, "The NQA Training Coordinator, CNQ, <u>in conjunction with</u> the site NQA training coordinators, <u>is</u> responsible ..." to "The Training Coordinator, CNQ and the site training coordinators are responsible..."	Organizational
17.2.2.16	Changed ISEG "Superintendent" to "Manager"	Organizational
17.2.6.2	Deleted "PBAPS QA Plan and"	Note 5
17.2.6.5	Deleted "delineated in the document control requirements of the QA Plan".	Note 5

17.2.9.4	Transferred responsibility for qualification of NDE personnel from NQA to Nuclear Maintenance Division.	Note 3
17.2.10.1	Changed "inspection" to "verification"	Editorial
17.2.10.2	Changed "inspection" to "verification"	Editorial
17.2.10.3	Changed "inspections" to "verifications"	Editorial
17.2.10.3.1	Changed "inspection" to "Verification," 3 places	Editorial
17.2.10.4	Changed "inspection" to "Verification"	Editorial
17.2.10.5	Changed "inspection" to "verification"	Editorial
17.2.10.7	Changed "inspection; inspecting" to "verification; verifying"	Editorial
17.2.10.12	Changed "inspection" to "verification"	Editorial
17.2.10.12.1	Changed "inspection" to "verification"	Editorial
17.2.14.11	Changed the "QA Plan" to "Administrative Procedures"	Note 5
17.2.17.1	Deleted "the QA Plan"	Note 5
17.2.18.4	Deleted "for the various aspects of the QA Plan"	Note 5
17.2.18.6	Deleted "the QA Plan"	Editorial
Appendix 17.2.II		
c.1	Changed "of the QA Plan" to "in Section 17.2.18.6"	Note 5

- Note 1:** PECO Energy uses the term "assessment" to include audits. The requirements for conducting an assessment equals or exceeds the requirements for performing an audit as defined in ANSI N45.2, 45.2.12, 45.2.23, the Technical Specifications, and other portions of the UFSAR.
- Note 2:** This item has previously been approved by the NRC by letter (L. H. Bettenhausen, NRC, to D. M. Smith, PECO Energy) dated October 4, 1993. The wording of this submittal is as approved by the NRC.
- Note 3:** Transfer of NDE Support to the Maintenance organization is one of the recommendations identified as part of the Nuclear Effectiveness and Efficiency Design Study (NEEDS) initiative; and has been approved and implemented.
- Note 4:** The Superintendents of the Quality Support, Assessment, and Administration Sections have been removed, and the duties are now the responsibility of the NQA Division Managers. The duties of the Manager are the same as the previous combined duties of the Superintendents and Manager.
- Note 5:** The PECO Energy "NQA Plan" has been determined to be redundant and no longer required, with suggested revised text in the UFSAR as identified.
- Note 6:** Inspections of radwaste/radmaterial shipments are not required to be performed by Quality Verification group personnel by any UFSAR or regulatory requirement.

ATTACHMENT 2

Changes made under 10 CFR 50.59 included in Revision 4 of the Limerick Generating Station Updated Final Safety Analysis Report, but not previously submitted to the NRC are identified below.

<u>Modification Number</u>	<u>Unit Number</u>	<u>Description</u>
5248	1 & 2	Remove turbidity indicators from Powdex Filter Demineralizer Common Discharge Header.
6146	1 & 2	Install corrosion and fouling monitoring system on Service Water and Circulating Water Systems.
6147	1 & 2	Tie-in between RHR and Fire Protection Systems for beyond DBA Drywell Spray Mode.
6178	1 & 2	Replacement of four (4) Instrument Air Dryer Packages to improve the reliability of the Instrument Air System.
6188	1 & 2	Install Additional Backwash Air Compressor for Perkiomen Pumping Station.
6194	1 & 2	Install Isolation Valves and associated Vent and Drain Valves to RHRSW System.
6195	1 & 2	Add Auxiliary Pump Controls to Perkiomen Pumping Station Auxiliary Pumps to allow continuous operation for freeze protection.
6202	1 & 2	Eliminate continuous alarm for Reactor Enclosure/Refuel Area Isolation Logic.
6216	1 & 2	Eliminate Refuel Water Pumps Nuisance Alarm.
6220	1 & 2	Relocation of Condensate Rejection Supply Line in support of newly installed Deep-Bed Demineralizers.
6221	1	Installation of a corrosion monitoring system in each loop of the RHRSW System.
6227	1	Replacement of the RHR System heat exchangers 1AE205 and 1BE205.
P-00114	1 & 2	Modify logic of the cooling water supply valve for the HPCI system to prevent an accumulation of water in HPCI turbine exhaust line following a HPCI turbine shutdown.
P-00283	1	Installation of a 2 inch bypass line around the Reactor Feed Pump Discharge Check Valves to allow drainage of the lines down stream of the check valves to the condenser hotwell.